

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
12.D1	Caerphilly C Borough Council			25/05/2012	<input type="checkbox"/>		C		M	

Document:Deposit Plan, p.0

Summary: General Introduction to CBCC's Representations

Item Question Representation Text

14 14 Representation

Newport City Council placed their Local Development Plan on Deposit on Friday 13 April and is open for comment until Monday 28 May 2012. Newport is an adjoining local authority to Caerphilly CBC and as such their LDP can have significant implications for development and land use delivery in the County Borough.

The Newport LDP is set out in the modern LDP format and contains Strategic Policies, which set out to deliver the LDP strategy, and general policies that include development control policies and land allocations. The LDP addresses all issues of development and covers housing, employment, climate change, sustainability, retail, leisure, community facilities, minerals, waste, environment, countryside, historic environment and renewable energy.

Comments on the Newport LDP will reflect upon issues that have the potential to affect planning and land use development in the Caerphilly County Borough Area and, as such, will tend to consider the more strategic elements of the plan (as the less strategic elements are likely to have only local impacts). In this respect 4 policy areas have been identified that could, potentially, have impacts upon Caerphilly CBC, namely, housing, employment, protection of the natural heritage (landscape) and transport. These are considered below. The other elements of the Newport LDP are considered not to have an impact upon Caerphilly CBC and as such there are no comments or objections offered in respect of them.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not ticked.

Representation Details

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12.D2//SP10	Caerphilly C Borough Council			25/05/2012	<input type="checkbox"/>		O		M	

Document: Deposit Plan, p.21

Policy: SP10

Summary: Housing requirement is not in accordance with the regional memorandum of understanding.

Item Question *Representation Text*

2 2 Policy Number
SP10

Representation Details

Newport City Council Local Development Plan

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Housing

The Newport LDP identifies its overall housing requirement as 8750 units for the plan period 2011 – 2026. The LDP further breaks this down into 5-year periods, as follows:

2011 - 2016 2016 - 2021 2021 – 2026

5-Year Requirement 250032503000

Annual Build Rate 500650600

Consideration Of The Housing Requirement

The housing requirement set out in the Deposit LDP is based upon the 2008 WG projections, which are derived from past development trends taken over the preceding 5 years. When utilizing projections based upon a short trend period, such as the WG projections, consideration needs to be given to the particular circumstances of the trend period compared to the projected period. In the case of the 2008 projections the trend period covers the latter years of the development boom period, whilst the projected period includes the downturn in the housing market. In addition to this the trend period includes a significant proportion of development with Cardiff City related to the boom in flat developments and sales, particularly in respect of Cardiff Bay. This development has skewed the past trends and a correspondingly high level of development is projected for Cardiff, whilst reduced levels of development are projected for surrounding authorities as a result.

The Newport LDP does not address the anomalies of the projections nor the skewed projections resulting from the short trend period. The only justification for using the 2008 projection is that the projections more accurately reflect the economic circumstances in Newport, but do not address the issues and problems raised elsewhere.

In order to address the cross-boundary and sub-regional issues posed by the identification of housing requirements across the South East Wales area, SEWSPG, in accordance with WG Guidance, sought to set out the parameters for the apportionment of the total housing requirement across the sub-region. In 2007 all 10 authorities who constitute SEWSPG, including Newport, agreed the 'South East Wales Regional Housing Apportionment - Memorandum of Understanding' which was based upon the WG 2003 projections. This Memorandum set out the number and relative proportion of the total sub-regional housing requirement that each local authority would accommodate within their LDPs. The document was intended to serve as "a working hypothesis in terms of housing growth to provide a regional context for the preparation of individual Local Development Plans". So whilst the projections may have been updated since the agreement, the document still sets out the relative proportions that each authority should seek to accommodate.

In 2007, the apportionment exercise identified that Newport should accommodate over 13% of the region's growth (12,100 dwellings at an annual building rate of 800 dwellings per year) up to 2021. The remainder of the housing requirement was taken up, to varying levels, by the other local authorities (Caerphilly accommodating 11,450 dwellings at an annual build rate of 650 dwellings per year).

The Deposit Plan sets out its requirement, based upon the 2008 projections, as 8750 dwellings, at an overall annual build rate of 585 per year. The 2008 projections identify that Newport increases from 59,600 to 68,900 dwellings between 2008 and 2028 (which encompasses the Deposit Plan period), a requirement for 7300 dwellings over the period. In this respect the Deposit Plan housing provision would appear reasonable. However, as outlined above, there are circumstances that skew the 2008 population and household projections, and these are evident in the figures themselves. Newport has the fifth lowest growth level, with only Torfaen, Blaenau Gwent, Merthyr and RCT realizing lesser growth levels. The issue of the projections being skewed is supported by the fact that Cardiff sees a growth level nearly 3 times higher than Newport and nearly twice as high as the next highest growth authority, Swansea (which also secured significant levels of flatted development).

By contrast the overall housing requirement across the SEWSPG region is 136,500 dwellings during the period 2008 – 2028. Newport's projected level of 7,300 only amounts to 5.3% of the total increase, whilst the Deposit Plan housing provision level of 8750 only equates to 6.4%. This level of provision is significantly lower than the agreed Memorandum level of 13%, which would require the Deposit LDP to make provision for 17,745 dwellings, at a rate of 890 per year. In comparison with the agreed Memorandum apportionment, the Deposit Newport LDP makes provision for less than 50% of the total housing requirement. In addition to under provision the Newport LDP provides no explanation of how the significant shortfall in provision will be met, although the inference is that the deficit will have to be made up by other authorities in the sub-region, requiring them to accommodate housing provision over and above their agreed Memorandum level.

Whilst the Memorandum has no formal status, it is the only regional agreement in place that seeks to agree the broad distribution of new housing development within the region in accordance with Welsh Government guidance. As such it forms part of the evidence for the consideration of the level of housing growth proposed in Newport, along with the WAG Population and Household projections and other considerations such as past completion rates, local evidence in respect of net migration rates and natural demographic change.

Overall the failure of the Deposit Plan to address and consider the Memorandum of Understanding and the cross boundary implications of the plan not meeting Newport's housing apportionment, as agreed by all member authorities of SWESPG, raises real concerns over the impacts of the Newport LDP housing strategy and its wider implications.

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CCBC Comment On Housing Requirement

Caerphilly County Borough Council raises a soundness objection in respect of soundness test C1 "It is a land use Plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas"

The Plan does not provide the level of housing set out in the agreed Memorandum of Understanding and also fails to justify why the apportionment exercise has not been taken into account in identifying housing land requirements. The Plan also fails to justify why the 2008 household projections are used in preference to the Memorandum and fails to address how the shortfall of housing land provision, created by the Newport LDP's under provision of housing land, will be met.

As such the Plan has not taken account of other authorities plans and strategies and fails to take account of an agreed sub-regional apportionment of housing provision, which contravenes soundness test C1.

15	15	Do you want to speak at Public Examination?	Neither
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C1	
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Item Question

Tick-box reply

6	6	A new policy	Yes
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12.D3//H04	Caerphilly C Borough Council		
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25/05/2012 M

Document:Deposit Plan, p.66

Policy: H04

Summary: No objections to affordable housing policy

Item Question *Representation Text*

14	14	Representation No comments or objections are raised in respect of housing site provision or affordable housing.	
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15	15	Do you want to speak at Public Examination?	Neither
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Item Question *Soundness Test*

1	1	I think the LDP is sound. Not Ticked	Neither
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Representation Details

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
12.D4//SP17	Caerphilly C Borough Council			25/05/2012	<input type="checkbox"/>		C		M	

Document: Deposit Plan, p.29

Policy: SP17

Summary: No objection to Employment Land Requirement and Allocation Figures

Item Question Representation Text

14 14 Representation

The Newport LDP identifies its overall Employment land requirement as 165 hectares for the plan period. This figure reflects past take up of employment land and the fact that the Newport economy is undergoing restructuring and repositioning in respect of its make up.

Consideration of Employment Land Requirement

The provision of employment land within Newport can have a significant adverse impact upon the take up of employment land within Caerphilly CBC. Newport benefits from being on the M4 corridor and, as a result, is likely to be more attractive than land within the Caerphilly basin. LDPs will need to ensure that employment development is distributed appropriately across the region to ensure that employment opportunities are maintained across all authorities. It is natural for a significant proportion of the employment development to take place along the M4 corridor. However an overallocation of employment land along the M4 corridor could sterilise employment development in other authorities.

The identified employment land requirement in the Newport LDP reflects both the short term and long term employment land take up trends, i.e. just over 11 hectares per year. Employment forecasts identify that between 1200 and 4000 jobs will be required. Given the employment land requirement has been set at 165 hectares, which equates to 11 hectares a year, it cannot be considered that the level of allocated land amounts to an overallocation, which could adversely impact upon the Caerphilly LDP objectives and aspirations.

CCBC Comment On Employment Land Requirement

It is noted that the employment land provision of 165 hectares is a significant reduction on the 2011 SEWEF Employment Land Assessment Report, which identifies Newport as having in excess of 270 hectares of employment land. Whilst it is a reduction this is in accordance with WG guidance and also addresses the projected land requirements for the plan period. AS such there are no adverse comments or objections raised in respect of the Employment Land allocation.

Other Employment Issues

No comments or objections are raised in respect of the Employment site allocations.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
12.D5//SP08	Caerphilly C Borough Council			25/05/2012	<input type="checkbox"/>		C		M	

Document: Deposit Plan, p.20

Policy: SP08

Summary: No objection to Landscape Protection Policy

Item Question Representation Text

14 14 Representation

Protection of the countryside is an objective of national planning policy. There are many aspects of the countryside that need to be protected, e.g. biodiversity, hedgerows and trees. Landscape is a critical part of landscape quality and, due to the fact that landscapes do not stop or reflect administrative boundaries, the issue of landscape protection is a cross boundary issue. Consequently those areas of Newport City that adjoin Caerphilly CBC need to be carefully considered to ensure compatibility.

The Newport LDP allocates Special Landscape Areas (SLAs), in seven broad locations, to protect the best landscapes within Newport City.

Consideration of Landscape Protection Compatibility

The Newport LDP identifies SLAs to protect the most important areas of landscape within the administrative areas. These SLAs have been designated utilising LANDMAP, the landscape assessment tool, in accordance with Welsh Government guidance. LANDMAP moves away from the traditional landscape assessment process of valuing visual appearance, by valuing landscape against five categories, including visual and sensory, cultural and historic and ecological importance. SLAs are then identified in areas that score in one, or more categories.

In contrast the Caerphilly LDP identifies SLAs and Visually Important Local Landscapes (VILLs). In the Caerphilly context SLAs are areas that score highly in two or more category areas. However this meant that a number of highly regarded visual landscape were omitted from SLA designations because they only featured highly in visual terms. These areas were identified as VILLs.

Despite the difference in application of the methodology the protection afforded to the landscape in both LDPs is relative to the reasons they were identified and, consequently, there is no conflict between the two sets of designations.

In location terms the Newport LDP identifies SLA Allocation SP8 (vii) – West of Rhiwderin, which includes the land west of Rhiwderin to the county borough boundary with Caerphilly, to the south and east of Caerphilly. Whilst the Caerphilly LDP only allocates part of the corresponding landscape in Caerphilly as SLA, the remainder has been allocated as a VILL and therefore there is no conflict. The only other area of consideration is to the east of Risca where the landscape has been allocated as a VILL in Caerphilly, but has not been protected in the Newport LDP. Given that the Newport LDP has not allocated VILL type allocations it can only be expected that the Newport LDP would not identify a corresponding allocation and therefore there is not a conflict at this location.

CCBC Comment On Landscape Protection

No comments or objections are raised in respect of Landscape Protection

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
12.D6//SP16	Caerphilly C Borough Council			25/06/2012	<input type="checkbox"/>		C		M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: No objections to Transport proposals.

Item Question Representation Text

14 14 Representation

Transport – Extensions to The Southern Distributor Road (SDR)

The Newport LDP allocates extensions to the existing Southern Distributor Road. An extension is proposed eastwards to the Magor M4 junction, through the Eastern Expansion Area (based around the former Llanwern Steelworks site), and westwards towards Coedkernew. The proposals would create a southern ring-road around Newport providing improved access throughout the City area.

Consideration of The Extension To The SDR

The proposals will create a strategic transport corridor to the south of the City from the M4 Magor junction to the A48 at Coedkernew (adjacent to the former LG plant). This transport route will serve as a distribution route to disperse and ease traffic movement throughout the city.

The proposals in the Newport LDP underpins recent WG proposals that seek to utilise the SDR route as part of a package of measures to alleviate pressure and congestion on the M4 motorway. However it must be noted that the proposed LDP extensions to the SDR are not proposed for this purpose. The extensions to the SDR have always formed part of the overall concept of providing a southern ring road for Newport, facilitating through traffic and increasing accessibility to the its centre and this is the justification for the proposals. The proposed extensions are required to fulfil the southern-ring road requirement and are not dependant upon the WG proposals coming forward.

As a result, the LDP allocations and the WG proposals need to be considered separately, as the WG proposals are likely to have significant impacts for surrounding and neighbouring authorities such as Caerphilly. The WG proposals are subject to their consultation process and it is this process that is the appropriate vehicle for making comments on the WG proposals. SEWTA are currently preparing comments in respect of this consultation.

Comments on the Deposit Newport LDP should, therefore, be based upon the content and objectives of the LDP. Consequently these comments will only address the LDP proposal to provide extensions to the SDR to provide the southern ring road.

The provision of a distributor road to the south of Newport from Magor to Coedkernew will have a major impact upon the traffic levels within and immediately surrounding the city of Newport, but is unlikely to have major impacts on authorities that do not immediately adjoin the western and eastern ends of the SDR route (i.e. Monmouthshire and Cardiff respectively). As such the proposals will not have an adverse impact upon Caerphilly CBC.

CCBC Comment On The Extension To The SDR

No comments or objections are raised in respect of the proposed Extensions to the SDR.

CCBC Comment on Other Transport Proposals

No comments or objections are raised in respect of the Transport Proposal in the LDP.

Other Policy Areas

There are no other policies that raise issues of greater than local importance and as such there are no issues in respect of the other policy areas.

15 15 Do you want to speak at Public Examination?

Neither

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<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.									
	Not Ticked									

13.D1 Cardiff County Council 28/05/2012 E C M

Document:Deposit Plan, p.0

Summary: No comments on the Plan.

<i>Item Question</i>	<i>Representation Text</i>	
14 14	Representation	
	Thank you for your letter dated 12th April 2012 consulting the Council on the Deposit Newport Local Development Plan. I can confirm at this stage the Council has no comments to make on the Plan.	
15 15	Do you want to speak at Public Examination?	Neither

<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	
	Not Ticked	

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15.D1//SP08	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.20

Policy: SP08

Summary: Consistent approach to landscape protection should be achievable as LANDMAP used.

Item Question Representation Text

2 2 Policy Number

SP8 - Special Landscape Areas

14 14 Representation

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

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

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15.D2//SP10	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.21

Policy: SP10

Summary: Housing provision is substantially below regionally apportioned figures.

Item Question Representation Text

2 2 Policy Number

SP10 - House Building Requirement

14 14 Representation

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

Dwelling requirements reflect the 2008 WG projections for the first 5 years of the plan period (i.e. 2011-2026) at 500 dwellings per annum (total 2500). This is lower than the 640 p.a. target set out in the Preferred Strategy and the SEWSPG regionally-apportioned figure of 800 p.a. to which Newport agreed. There is concern that the lower figure over the early stages of the plan period could have a negative impact on both Newport - including not meeting affordable housing requirements - and in the wider region in terms of placing increased pressure on neighbouring authorities to deliver housing growth.

For the remainder of the plan period 2016-2026 higher growth aspirations/trends are considered to be more appropriate, with 650 dwellings p.a. proposed for 2016-2021 (total 3250) and 600 dwellings p.a. for 2016-2026 (total 3,000), giving a total dwelling requirement of 8,750 over the plan period. While it is acknowledged that these more optimistic growth targets may contribute positively to wider regional needs further on in the plan period, the overall dwelling requirement figure remains substantially below that originally set out and concerns remain, as noted above.

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

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15.D3//SP11	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.23

Policy: SP11

Summary: A TIA should be undertaken for any development proposals relating to the EEA.

Item Question Representation Text

2 2 Policy Number

SP10 - Eastern Expansion Area

14 14 Representation

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

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

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15.D4//SP16	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: Clarify why M4 Relief Road is not allocated as a Major Road Scheme.

Item Question Representation Text

14 14 Representation

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

Given proposals to develop the Eastern Expansion Area, it is important that the cross-boundary implications of the eastern extension of the southern distributor road and of traffic generated from development is thoroughly considered. Need for TIA to include that part of the highway network from the county boundary to Junction 23A.

The need to safeguard the route of the proposed M4 relief road between Junction 23A at Magor and Junction 29 at Castleton is acknowledged in the supporting text to Policy S16 and constraints map. However, it is not included as a major road scheme for which land will be safeguarded in Policy S16. Seek clarification as to why the M4 relief road has not been included in Policy S16 as a major road scheme. Policy MV10 of the Monmouthshire LDP safeguards the route of M4 relief road that lies within its boundary.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

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15.D5//CE04	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.49

Policy: CE04

Summary: Traffic consequences of Employment Land Allocations should be assessed.

Item Question Representation Text

14 14 Representation

Policy S17 makes provision for approximately 165ha of employment land over plan period. New industrial and business development is proposed in south east Newport within the Eastern Expansion Area (Policy S18). Given the areas's proximity to Magor/Undy the focus on this allocation is likely to bring additional employment prospects for the sub-region.

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
15.D6//H01	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.62

Policy: H01

Summary: Traffic impact of housing proposals should be assessed including Junction 23a in Monmouthshire.

Item Question Representation Text

14 14 Representation

Policy H1 identifies the main sources of housing land in Newport. The key sites with potential cross-boundary implications for Monmouthshire are the Eastern Expansion Area (H3) and Glan Llyn (former Llanwern (H47) which make provision for of 1,100 dwellings and 2,997 dwellings respectively over the plan period. Given the proximity of these allocations to the western boundary of Monmouthshire at magor/Undy, the significant amount of residential development proposed in this area is likely to bring benefits of an expanding residential market for the sub-region.

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

15.D7//H04 Monmouthshire County Council

28/05/2012 E O M

Document:Deposit Plan, p.66

Policy: H04

Summary: Plan is unclear on how Newport will meet its affordable housing requirement.

Item Question Representation Text

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

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by: Representation No

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15.D8//H15	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	S		M	

Policy: H15

Summary: Support Gypsy and Traveller site allocations

Item Question Representation Text

14 14 Representation

Support provision of transit and residential Gypsy and Traveller sites in Newport identified in policies H15 and H16.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

15.D9//H16	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>		S		M	
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Document:Deposit Plan, p.72

Policy: H16

Summary: Support Gypsy and Travellers allocations.

Item Question Representation Text

14 14 Representation

Support provision of transit and residential Gypsy and Traveller sites in Newport identified in Policies H15 and H16.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

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15.D10//EM01	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.73

Policy: EM01

Summary: Transport implications of employment allocations will need to be assessed.

Item Question *Representation Text*

14 14 Representation

Policy EM1 identifies 142 ha of employment land at Glan Llyn (former Llanwern) for large scale projects of at least 10ha, and 16has at Gwent Europark for B8 uses. Gwent Europark adjoins Monmouthshire's western boundary in Magor - its proposed use for B8 distribution uses in considered appropriate and reflects those employment allocations in the Monmouthshire LDP.

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

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

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15.D11//EM02	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Policy: EM02

Summary: TIA needs to be undertaken for EEA related proposals.

Item Question Representation Text

14 14 Representation

Policy EM2 encourages regeneration schemes at Glan Llyn, Llanwern (194 ha for residential, community, commercial and leisure uses), Llanwern former steelworks eastern end (51 ha for B1, B2, B8 use) and Llanwern former tipping area south of Queensway (122ha for B1, B2, B8 use).

Given the proximity of this area to the western boundary of Monmouthshire at Magor/Undy, it is considered that the continued focus on the former steelworks for residential and employment development is likely to bring benefits of an expanding residential market and additional employment prospects for the sub-region.

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

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15.D12	Monmouthshire County Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.13

Summary: Plan does not give any consideration to the spatial strategies of adjoining authorities.

Item Question Representation Text

14 14 Representation

Support the strategy's emphasis on brownfield regeneration. Newport has significant regeneration / brownfield opportunities for new residential and employment development which should be maximised.

The Deposit LDP does not appear to give any consideration to the spatial proposals/policies contained in the Monmouthshire Deposit LDP or to other adjoining development plans. Reference should be made to spatial strategies included in LDPs of neighbouring authorities and any cross border issues identified and taken into account (Soundness test C1 refers).

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
C1

17.D1//SP07 Torfaen C Borough Council

28/05/2012 E S M

Document:Deposit Plan, p.19

Policy: SP07

Summary: Support Green Wedge SP7iii) & iv)

Item Question Representation Text

14 14 Representation

Torfaen County Borough Council would like to make the following comments in relation to the Deposit Newport Local Development Plan.

Green Wedge - Support the Green Wedge policy SP7iii), iv)

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

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17.D2//SP22	Torfaen C Borough Council			28/05/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.34

Policy: SP22

Summary: Torfaen are not in position to take a portion of Newport's apportionment figure.

Item Question Representation Text

14 14 Representation

Minerals - Torfaen was not approached and is not in a position to take a portion of the Newport apportionment figure as set out in the RTS.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

17.D3//SP18 Torfaen C Borough Council

28/05/2012 E O M

Document:Deposit Plan, p.30

Policy: SP18

Summary: Employment land is high.

Item Question Representation Text

14 14 Representation

Employment Land - The amount of employment land allocated appears high. There is concern that an oversupply of employment land will reduce values in the region and make it harder to market and develop more suitable but marginal brownfield sites. Need for employment land appears based on historically high employment land provision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

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17.D4//SP13	Torfaen C Borough Council			28/05/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.25

Policy: SP13

Summary: Potential for Torfaen and Newport to work together on CIL

Item Question Representation Text

14	14	Representation								
CIL - The close geographical relationship and similarities in the housing /employment and development markets between Torfaen and Newport makes it appropriate to potentially work together in setting CIL levels. The opportunity for joint working on this issue should be investigated.										

15	15	Do you want to speak at Public Examination?	Neither							
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Item Question Soundness Test

1	1	I think the LDP is sound.	Neither							
Not Ticked										

17.D5	Torfaen C Borough Council			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.0

Summary: Value of the Monmouthshire and Brecon Canal should be made more explicit

Item Question Representation Text

14	14	Representation								
Monmouthshire and Brecon Canal - The importance of the canal in terms of function as a historical, recreation, transport and natural environment asset could be more explicitly stated particularly in relation to policies CE3, CE4, Historic environment section, natural environment section, Policy T5, CF4, CF9.										

15	15	Do you want to speak at Public Examination?	Neither							
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Item Question Soundness Test

1	1	I think the LDP is sound.	Neither							
Not Ticked										

Representation Details

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28.D1//H01	Newbridge Construction Ltd	Boyer Planning	- Cardiff	10/07/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.62

Policy: H01

Summary: Objection to Policy H1 - housing numbers should be increased - including the allocation of 200 additional dwellings at site H1(12) Former Tredegar Park Golf Course

Item Question Representation Text

- 2 2 Policy Number
H1 - Housing Sites (Numbers)
- 11 11 Site Name
Former Tredegar Park Golf Course
- 12 12 Site Reference
H1 (12)

Representation Details

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14	14	Representation								
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1.1 On behalf of Newbridge Construction Ltd we object to the approach taken by the Deposit LDP with regards to the housing requirement.

1.2 We consider the approach taken by the Council against the requirements of Planning Policy Wales (PPW), which sets out criteria that Local Authorities must take account of when setting their housing requirement. Whilst the Authority has used the WG projections as their starting point, they plainly ignore the implications of the Local Housing Market Assessment that they have submitted as part of their evidence base which when based on up to date information and extrapolated forward indicates a much higher level of need than provided for.

1.3 We also consider that it is inappropriate to rely upon a number of the sites identified within policy H1 that are subject to numerous constraints and have remained undeliverable for some time. A number of such sites are identified as "new allocations" whereas in reality they have been carried through previous plans with no developer interest or signs of such interest.

1.4 In this context and based on our consideration of the Plan in relation to National Policy requirements, it is our view that the housing requirement is wholly inadequate and contrary to the following tests of soundness:

- C1 in that it does not have proper regard to other plans, policies and strategies relating to the area;
- C2 in that the housing provision strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- C3 in that it does not have regard to the Wales Spatial Plan;
- C4 as it does not have regard to the relevant community strategy;
- CE1 in so far as the proposed housing provision strategy does not flow logically from the proposed strategy of the plan;
- CE2 in that this level of housing is not realistic and appropriate having considered the alternatives and is not founded on a robust and credible evidence base in terms of local need;
- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local needs and promote future economic growth.

1.5 Accordingly, in order to make the plan sound it is necessary for the Council to increase the housing requirement and to identify a robust and deliverable supply of land for housing. We set out our reasoning in the following paragraphs.

2.0 Factors Underpinning the Housing Requirement

2.1 Para 9.2.1 of Planning Policy Wales (4th edition) indicates that in planning the provision for new housing local authorities must take account of the following:

- People , Places, Futures - The Wales Spatial Plan;
- Statutory Code of Practice on Racial Equality in Housing - Wales;
- the Assembly Government's latest household projections;
- local housing strategies;
- community strategies;
- local housing requirements (needs and demands);
- the needs of the local and national economy;
- social considerations (including unmet need);
- the capacity of an area in terms of social, environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing;
- the environmental implications, including sustainable building standards (see Section 4.11), energy consumption, greenhouse gas emissions and flood risk;
- the capacity of the existing or planned infrastructure; and
- the need to tackle the causes and consequences of climate change.

2.2 Whilst 9.2.2 indicates that the starting point for assessing housing requirements is the latest Government Household projections but it is very clear that other sources of local evidence should be considered.

"In estimating housing requirements local planning authorities should integrate the provisions of their local housing strategies with the relevant provisions of their development plans".

2.3 PW expressly requires that Local Planning Authorities should consider the appropriateness of the projections for their area based on all sources of evidence including the need for affordable housing identified by their Local Housing Market Assessment (LHMA). I deal with this in more detail below, however, it is evident that the LHMA relied upon by Newport is both out of date (published in 2007) and plainly inaccurate in terms of its predictions of how matters would have proceeded over the 5 years following its publication to the present day.

2.4 Based on the Planning Policy Wales requirements, it is evident that having regards to the criteria listed, the Deposit LDP has significant shortcomings in relation not only to national guidance but also other plans, the community strategy, the evidence base, housing need and the Plan's own objective. We consider below the key elements in setting a housing requirement.

3.0 Strategies and Plans

The Deposit LDP Vision and Objectives

3.1 The Deposit LDP Objectives clearly set the context for what the policies within the Plan must achieve. Objective 4 seeks to ensure that there is an adequate supply of land for housing which meets the needs of the populations. It explains that the LDP proposes a level of housing that enables everyone to have access to decent housing.

3.2 The primary role of the subsequent policies within the LDP is clearly to help achieve the strategic objectives. It is evident that in this case these are not "cascaded down" into the policies within the Plan that are intended to implement the strategy. Indeed, the approach to housing provision adopted within the Deposit LDP is based on a LHMA (absent an up to date Assessment) that plainly identifies

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a level of need that is higher than the level of growth proposed and comprises a significant number of sites that have proven undeliverable through the UDP process – such that there remains a residual requirement from the LDP. In that regard the plan clearly cannot achieve its own vision or objectives.

The Wales Spatial Plan (WSP)

3.3 The aspirations for the South East Region are set out in detail in the WSP, in particular the vision for the area is to create “an innovative skilled area offering a high quality of life - international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and Europe, helping to spread prosperity within the area and benefiting other parts of Wales.”

3.4 To adopt a restrictive approach towards housing is fundamentally out of line with the overarching vision for the region and will not contribute towards the achievement of the main priorities identified in the WSP including Promoting a Sustainable Economy.

Local Housing needs

3.5 The LHMA submitted as evidence in support of the plan does not form a reliable source of evidence. It was published in 2007, five years before the LDP was placed on deposit and included assumptions over the deliverability of housing land between 2006 and 2011 that have proven to be an underestimation of actual delivery.

3.6 Page 27 of the LHMA sets out that the number of net additional dwellings required between 2003 and 2021 is 12,100. With 1,210 completed in 2003 to 2006, 3,630 planned between 2006 and 2011 and then a residual requirement of 7260 (726 per annum) over the 10 years between 2011 and 2021. I would note that the LDP plans for 151 dwellings less than this per annum and 1510 dwellings less over all during this period.

3.7 Furthermore, it is possible to update the calculations on behalf of the Council. The Residual target as of 2006 was 10,890 from 2006 to 2021. Minus actual completions between 2006 and 2011 (2,561 rather than 3,630 dwellings anticipated in 2007) equates in a residual requirement between 2011 and 2021 of 8,329 dwellings (832.9 dwellings per annum). Again the LDP provision would be 258 less per annum and 2,579 dwellings less than required over the period to 2021.

3.8 If the LHMA requirement to 2021 was extrapolated forward for the plan period to 2026 then it would equate to 12,494 dwellings required over the plan period. This is significantly more than proposed by the Deposit LDP.

3.9 In the absence of any more up to date Housing Market Assessment this clearly forms a significant consideration, insofar as it is plainly the case that the Council's housing supply would not meet the requirements set out in their Local Housing Market Assessment, rather there would be a significant shortfall.

3.10 The WG “Homes for Wales” white paper indicates that if they are to be effective, LDP's require a robust evidence base and as part of this “Local authorities must assess the need for all types of housing, using up-to-date Local Housing Market Assessments.” Whilst this is a consultation paper it is clear that LHMA's contribute towards the evidence base in informing policies and current policies fall short of what is desirable. Newport Community Strategy 3.11 The Newport Community Strategy sets out the key aspirations for the local community 2010 to 2020. The aim of the strategy is to enhance the quality of life of local communities through actions to improve their economic, social and

environmental wellbeing. The Vision is to create a “proud and prosperous city with opportunities for all”. This includes objectives related to create a thriving economy, for people to thrive and live in a safe and inclusive economy, 3.12 The approach taken by the Deposit LDP towards housing provision implies that the Community Strategy cannot be achieved. Indeed, the lack of basic provision of housing to meet identified needs can only be considered to be contrary to the fundamental requirements of people and can only harm the implementation of the Community Strategy. As such the LDP can only be considered to be unsound in its current form as it effectively undermines the Community Strategy for the area.

4.1 Social Considerations & Housing Requirements

4.1 The Assembly Government's vision for housing in Wales, Better Homes for People, is that everyone should have the opportunity to live in good quality, affordable housing; be able to choose where they live; and decide whether buying or renting is best for them and their families.

4.2 In addition to the LHMA, the Local Housing Strategy update (2010) indicates that there are 5,100 households on the waiting list for affordable housing. This level of need equates to significantly more housing (regardless of tenure) than that identified by the LDP.

4.3 The Plan's strategy should be capable of dealing efficiently with a range of circumstances. By not proposing a housing requirement in line with evidence of housing need, the LDP will not be able to deal with the implications of population change, household growth and demand and will not be able to meet the housing needs of its population contrary to Welsh Assembly aspirations and the Deposit LDP Strategy.

4.4 Were the Plan not to provide an adequate level of overall housing provision this would have significant harmful social and economic effects.

4.5 It is a WG objective to tackle social exclusion and to reverse social inequalities. Access to decent housing is at the heart of social inclusion. Under provision of housing through the planning system will undermine this. The greatest impact will fall upon low income households and young people

looking to become active in the housing market. Under-provision leads to overcrowding, concealed households and poor quality housing and is contrary to the objectives of the Welsh Government to secure social inclusion.

5.0 Local Economic requirements

5.1 Housing provision forms part of the supporting framework in order to support the Welsh Government's aim to increase employment and local growth. Indeed, the WG Economic Renewal Strategy 2010 sets out the Welsh Government's objectives for helping to shape the future of the Welsh Economy and leading the Country out of recession. The programme sets out a new direction for economic renewal and is based on the understanding that the economy is “simply to dynamic to forecast credibly over the long term”. As such the Strategy sets out how the WG (and other levels of Government) can help to “shape the conditions in which a dynamic economy functions, and the role the government and wider public sector can play in encouraging success in the private and third sectors”.

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5.2 A constrained housing market will have an inflationary impact on land and house prices – which will only exacerbate existing problems. Housing shortages and high prices will limit the ability of labour markets to develop. This will inevitably result in shortages of skilled labour, increasing wage levels and increased long distance commuting. Such problems damage competitiveness, restrict the ability of companies to expand and deter employers from locating in the area and damage employment growth. Jobs will ultimately be lost to other regions in Wales, the UK and to Europe.

5.3 It is imperative that the Plan adopts a robust and positive approach to economic growth (and housing provision) so as to avoid the harmful effects that will occur under the present approach and importantly to avoid a continuation of existing trends that sees young local families unable to compete on the housing market due to the influx of retirees from other parts of the United Kingdom.

6.0 Housing Land Supply

6.1 Allied to our objection to the overall level of housing is our objection to the Council's housing land supply estimate which underpins the allocation of new housing land in Policy H1. Indeed, PPW is explicit that sites should be

identified that are land is genuinely available or will become available for development – and importantly sites must be free or readily freed from planning, physical and ownership constraints and economically feasible for development so as to create communities where people want to live.

6.2 There are a significant number of sites that the Council envisage will be brought forward in the LDP that were identified within the UDP and remained undeveloped and classified in the latest JHLAS as 3(i). Where constraints exist it is unlikely that such sites will be brought forward in the LDP period as has historically been the case – this is demonstrated in consecutive Joint Housing Land Availability Studies. This emphasises the importance of ensuring a robust supply of land. I highlight several of those sites below:

1. Unimplemented UDP Sites – subject to constraints (flood risk, remediation etc). (including Glebelands, Herbert Road, Whiteheads and Crindau);
2. High density flat schemes – a number of high density flattened schemes have been mothballed in recent years or have under delivered. As such there is little justification for the inclusion of a number of schemes where there is no apparent market interest (including Penmaen Whard, Newport Athletic Club);
3. Overestimation of delivery – I note at Llanwern that based on the trajectory within the agreed Statement of Common Ground for the 2011 JHLAS, it is estimated that it would deliver 2100 dwellings during the plan period, leaving 1900 dwellings outside of the plan period not c.1000 as envisaged by the Council. In addition, it is indicated that Allt Yr Yn will comprise 200 dwellings, however, planning permission on the site was 129 units;
4. S106 sites – there is no evidence presented to suggest that these sites will actually be brought forward.

6.3 It is our view that based on trends over the UDP period, it is highly unlikely that a number of the identified sites will deliver at the levels that Newport envisage. Should the above categorisations be born out then there would be a shortfall of between 3,000 and 4,000 dwellings on the level envisaged as being appropriate by Council i.e the WG projection plus the flexibility allowance.

Phasing

6.4 At para 2.38 we note that Newport CC indicate that many of their brownfield sites had progressed slowly due to the economic recession between 2009 and 2011. Whereas in actual fact, many of the Brownfield sites remained undeveloped with no interest or unimplemented planning permissions through the peak of the market in the early to mid 2000's and are still categorised in 3(i) of the JHLAS. Indeed, as a sign of the constrained nature of the housing supply in Newport, the peak rate of completions was 714 in 2001 and fell as low as 340 completions in 2004 and 425 in 2005 – as generally in the UK the housing market was moving towards its peak.

6.5 The reliance upon phasing within the UDP was proven to be wholly unreliable and cannot be a basis for carrying forward through the LDP. Indeed, the strategy was rather haphazard - when the UDP required 400 dwellings per annum between 2001 and 2006 they were in fact averaging 508 completions, however, for the final five years the average was significantly below the 740 dwellings required. This resulted in an overarching shortfall of 400 dwellings of the overarching requirement not being provided – this amounts to nearly a years supply of housing not being provided. Clearly this is not acceptable in light of the significant level of housing need identified within the LHMA.

6.6 It is evident that there is no basis for a strategy of phasing in Newport, particularly not when the council should be encouraging high rates of development to meet the unmet requirements of the UDP and the high levels of housing need identified by the LHMA which were also unmet.

Flexibility Allowance

6.7 There should be an element of flexibility in the housing land supply. This is accepted within the Council's existing figures 25% component of any housing land supply estimate to reflect the fact that not all sites with planning permission or allocated in the Plan will be developed either in whole or in part within the Plan period. Planning permissions may lapse and sites may be developed for alternative purposes – as has proven to be the case through the UDP. Such an allowance for non implementation is significantly more important when considering the needs within the area and the number of UDP sites that have remained undeveloped due to constraints.

7.0 Conclusion

7.1 In our submission, and having regard to the requirements of a plan-led system and Planning Policy Wales, the Plan should seek to meet the future accommodation needs of its inhabitants which is essential if the City is to thrive as envisaged by the Community Strategy.

7.2 The implications of such a restrictive approach include lack of private sector investment, exacerbation of housing shortages and failure to achieve the key objectives of the LDP. Rather there should be a strong element of forward thinking in order to produce a sound Plan to ensure that long term issues are addressed and that needs are met in the most sustainable manner. In this context, and having regard to the matters set out herein, adopting a higher growth scenario as a basis for land allocations is essential to produce a sustainable and sound strategy which meets the needs of the County.

8.0 Required Change

8.1 That a housing requirement be set for the County that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. We estimate, based on the available

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indicators, around 12,494 dwellings. In addition to this figure should be added a 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates.

8.2 In light of the identified problems within County in terms of affordability providing to meet estimated housing requirements is essential to ensure an adequate supply of land, retain local families and young people. Constraining supply in these terms would inevitably result in a very unbalanced community profile contrary to the aims and objectives of the LDP.

8.3 Our estimated requirement provision figure for the plan period is 16,100 dwellings. We would hope that the Council will be willing to engage in meaningful discussions with parties such as ourselves to resolve any technical differences over the assumptions used prior to the Examination.

8.4 Accordingly, additional sites must be allocated in order to meet this shortfall. To that extent it is considered that the capacity of site H1 (12) should be increased to 200 dwellings.

8.6 The site already benefits from planning permission and the technical work that has been undertaken to date indicates that the site is capable of accommodating a greater number of dwellings. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
Due to significant issues raised in the representations.										

Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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13	13	Test of Soundness								
C1, C2, C3, C4, CE1, CE2, CE4										

Item Question *Tick-box reply*

6	6	A new policy								
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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
28.D2//SP08	Newbridge Construction Ltd	Boyer Planning	- Cardiff	10/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.20

Site: 347/ Former Tredegar Park Golf Course

Boundary Change

Policy: SP08

Summary: Remove the site at former Tredegar Park Golf Course from the Tredegar Park Special Landscape area

Item Question Representation Text

2 2 Policy Number

SP8 - Special Landscape Areas - Former Tredegar Park Golf Course

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

SPECIAL LANDSCAPE AREAS

Page: 20

Policy Reference: SP8 - Special Landscape Areas

1.0 Introduction

1.1 Newbridge Construction Ltd objects to the inclusion of land at The Former Tredegar Park Golf Course within the Tredegar Park Special Landscape Area designation. The land concerned is shown on the attached plan.

1.2 Inclusion of this land within the Tredegar Park Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests:

- CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and
- CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

LANDMAP Designation

2.1 In terms of the evidence base for the designation of the Special Landscape Areas (SLA) as referred to in the Deposit Plan there are a number of issues which need to be addressed.

2.2 Firstly the use of the LANDMAP information system in determining potential SLAs within Newport is driven by Planning Policy Wales (2011 4th Ed) in which Paragraph 5.3.13 states that LANDMAP "...can help to inform

supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design)".

2.3 However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst

Planning Policy Wales states that the data should 'help to inform' supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.

2.4 In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP

Information Guidance Note 1 is 'coherence.' This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of a distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.

2.5 Concern is also raised in relation to the definition of boundaries. The TACP Report - Designation of Special Landscape Areas (2009), which is appended to the Background Paper, highlighted the need for the subsequent confirmation of the detailed boundaries by the Authority.

2.6 In this regard paragraph 5.2 of the SLA Background Paper states that "The proposed SLA boundaries for the LDP are justified as being located either: along Newport Authority's administrative boundary, the proposed settlement boundary from the LDP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous".

2.7 However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach they Authority have in the majority of cases, not had regard to landscape quality and adjoining influences.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2.8 We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries so as to include only those landscapes worthy of protection by virtue of their special status.

3.0 Special Landscape Area Boundary

3.1 Given the above comments on the LANDMAP assessment and subsequent definition of the boundaries proposed by the Authority it is also important to highlight that the site at former Tredegar Park Golf Course is degraded and lacks any special quality and is heavily influenced by the physical infrastructure of the previous golf course. It is therefore evident that the site is subject to urban and human influences.

3.2 Therefore the characteristics of the site and surrounding environment have an impact upon the site and its inclusion within the designated Tredegar Park Special Landscape Area.

3.3 It is unclear whether all landscapes within the proposed designated area are worthy of equal protection, given that it relates mainly to Tredegar Park House and that a more detailed assessment of the boundaries should be undertaken rather than default to cover all land in close proximity to the important Tredegar House area.

4.0 Required Change:

4.1 That the site at former Tredegar Park Golf Course be removed from the Tredegar Park Special Landscape Area.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination Due to the significant issues raised in the representations.								
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Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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13	13	Test of Soundness CE1, CE2, CE4								
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
28.D3//H01	Newbridge Construction Ltd	Boyer Planning	- Cardiff	10/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.62

Site: 348/ Former Tredegar Park Golf Course

Boundary
Change

Policy: H01

Summary: Amend the site boundary of allocation H1(12) to correctly reflect the boundary of the approved residential area

Item Question Representation Text

-
- 2 2 Policy Number
H1 - Housing Sites (Allocation H1(12) - Tredegar Park Golf Course)

 - 4 4 The Proposals Map
Allocation H1 (12) - Tredegar Park Golf Course

 - 9 9 Amend the boundaries of an existing site.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

1.0 Introduction

1.1 Whilst Newbridge Construction Ltd support the principle of residential development at the Former Tredegar Park Golf Course Site an objection is raised in relation to the site allocation boundary of 1-11(12) as it does not properly reflect the area approved for residential development as per the existing planning consents approved under Appeal APP/G6935/A/05/1193193 and subsequently Planning Permission 09/0096. The correct extent of the land concerned is shown on the attached plan.

1.2 The omission of part of the site from within the housing allocation H1(12) results in the Deposit Local Development Plan being unsound in terms of the following tests:

- CE2 in that the site boundaries are not founded on a robust and credible evidence base; and
- CE4 in that omitting sections of the site boundary, as approved via planning permissions, from the housing allocation site does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Boundary

2.1 Significant concern is raised by the fact that the site boundary at the Tredegar Park Golf Course Housing Allocation H1(12) does not properly reflect the extent of residential development as approved by the initial Appeal APP/G6935/A/05/1193193 and subsequently Planning Permission 09/0096.

2.2 The proposed site boundary omits a large area of residential development along the eastern boundary. It is evident that the Authority have utilised an arbitrary boundary for the eastern side of the site, whereas in fact the true extent of the approved residential development goes much further towards the eastern boundary of the Golf Course as defined by the railway line. There is no justification or explanation as to why the site has been reduced and it not founded on any credible evidence base.

2.3 The reduction in the site boundary is also highlighted by the fact that the Deposit Plan proposes a housing allocation of 5.2ha, whereas the Appeal Inspectors Report (2006) Paragraph 22 describes the proposal as providing 6.4ha of residential land. Given the Inspector has stated that the residential area is at 6.4ha then this figure should be given as a minimum within the proposed policy in order to allow future flexibility to deal with housing needs.

2.4 The reduction in the site is not only without appropriate evidence but also does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

3.0 Required Change

3.1 That the site boundary for housing allocation H1(12) be amended to correctly reflect the boundary of the approved residential area under Appeal APP/G6935/A/05/1193193 and subsequently Planning Permission 09/0096 as per the attached site plan.

3.2 Also that the proposed site area both on the Proposals Map and within Policy H1(12) of the Deposit Plan be amended to reflect the approved residential area of 6.4 hectares as a minimum.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
Due to the significant issues raised in the representations.			

Item Question	Soundness Test	
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1	1	I think the LDP is sound.	No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness									
	CE2, CE4									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
28.D4//T5	Newbridge Construction Ltd	Boyer Planning	- Cardiff	10/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.85

Site: 353/ Former Tredegar Park Golf Course

Boundary Change

Policy: T5

Summary: Long distance walk and cycleway to be removed from housing site H1(12) and walkway alignment to northeast of site needs amending

Item Question Representation Text

2 2 Policy Number
T5 - Walking and Cycleways

4 4 The Proposals Map
Alignment of T5 - Walking and Cycleways at Tredegar Park Golf Course

Yes

9 9 Amend the boundaries of an existing site.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
14	14	Representation								
		1.0 Introduction								
		1.1 Newbridge Construction Ltd objects to the proposed alignment of the long distance walking and cycleway as contained within the former Tredegar Park Golf Course.								
		1.2 The proposed alignment of the walking and cycleway, both through and to the northeast of the Housing Allocation H1(12) - Former Tredegar Park Golf Course are restrictive and subject to land ownership and existing use concerns. The proposed alignments are therefore contrary to the following tests of soundness: - CE2 in that the proposed alignment is not realistic or appropriate and is not founded on a robust and credible evidence base; and - CE4 in that continuing with the alignment as per the Proposals Map it does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with future residential design and land ownership issues.								
		2.0 Amplification								
		2.1 Whilst the proposed routes of the long distance walking and cycleway are not prescriptive it is important to highlight there are concerns relating to the principle of the routes through both the Housing Allocation H1 (12) and the Whitehead sports and recreation ground.								
		2.2 The routes shown do not seem to take account of the existing planning permissions at the Tredegar Park Golf Course site or the fact that the northeastern alignment would cross directly over the existing bowling green.								
		2.3 Given that the wider surrounding area within the Former Tredegar Park boundary is proposed to provide open space and sports fields, outside of the residential development area, it is considered that the alignment would be better placed elsewhere on site.								
		2.4 The provision of the route running directly through the housing allocation area is deemed as unduly restrictive and has the potential to influence future layouts and does not allow flexibility at that point.								
		2.5 Furthermore there is no indication as to why the current route has been suggested and there seems little evidence base to justify the proposed alignment.								
		3.0 Required Change								
		3.1 That the long distance walk and cycleway be removed from with the housing allocation site at H1(12) as at present no detailed layout plans are provided and the introduction of this route will have a restrictive impact upon the future development of the site.								
		3.2 Furthermore that the alignment of the walk and cycleway to the northeast of the should be amended as firstly it does not accord with the extent of residential development as approved under Appeal APP/G6935/A/05/1193193 and subsequently Planning Permission 09/0096 (as per separate submissions) and secondly currently passes directly through existing Whitehead Sports/Recreation Ground.								
Additional Information Submitted - Available on Request										
15	15	Do you want to speak at Public Examination?							Yes	
16	16	Subject to speak on at Examination								
		Due to the significant issues raised in the representations.								
<i>Item Question</i>	<i>Soundness Test</i>									
1	1	I think the LDP is sound.							No	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness									
	CE2, CE4									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
35.D1//CE04	British Waterways			23/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.49

Policy: CE04

Summary: Plan should include a new, specific policy on the Monmouthshire & Brecon Canal

Item Question Representation Text

2 2 Policy Number

CE4 & CF4

7 7 A new paragraph or new text.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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As you are aware British Waterways (BW) is a public corporation, which is sponsored by DEFRA. In June 2012 we will become the Canal & River Trust (Glandwr Cmyru) but we will continue to manage and care for more than 2,000 miles (3,220 kms) of canals and rivers in England, Scotland and Wales on behalf of the British people. The Government charges us to:

- Maintain and develop Britain's inland waterways in a sustainable manner, so that they fulfil their full economic, social and environmental potential;
- Fulfil statutory navigation functions;
- Conserve waterway heritage and environment for the future;
- Promote and enable rural and urban regeneration;
- Maintain and enhance leisure, recreation, tourism and educational opportunities for the general public; facilitate waterway transport; and
- Play a lead role in co-ordinating with other UK navigation authorities.

BW's Corporate Strategy and Mission Statement set out the following:

- The business is to manage the inland water system efficiently for the increasing benefit of the United Kingdom;
- BW aims to provide safe and high quality environment for customers, staff and local communities;
- BW takes a commercial approach and strives for excellence in every aspect of work; and
- The heritage and environment of the waterways will be conserved, improved and made to work well for future generations.

British Waterways works extensively with private, public and voluntary partners to conserve, enhance and improve these waterways. Our expertise and responsibility for water space, combined with their ownership of docks, canals and waterside properties, puts us in a unique position to facilitate redevelopment for both economic and environmental gain. The canals in particular have historically experienced a prolonged period of decline. In recent years, the canals and river navigations have experienced significant development pressures from commercial, residential and tourism/recreation developments. Attractive waterside environments have stimulated this interest and been at the heart of some of the most significant regeneration schemes in the South West and Wales.

In recognition of the pivotal role of the waterways in the planning and development processes, BW has produced 'Waterways & Development Plans' (2003) to guide the key stakeholders in the process of integrating the inland waterways into the development plan system. Your attention is also drawn to 'Waterways for Tomorrow' (DETR 2000) and 'Planning a Future for the Inland Waterways' (Inland Waterways Amenity Advisory Council 2001). CD-Rom versions of these documents can be made available on request.

In June 2009, British Waterways and the Town and Country Planning Association launched a Policy Advice Note (PAN) "Unlocking the Potential and Securing the Future of Inland Waterways. The purpose of this PAN is to:

- highlight the different types of waterways that form the inland waterway network, including their different characteristics, roles, uses and functions;
- promote the contribution that inland waterways make to economic, social and environmental agendas;
- demonstrate how inland waterways contribute to the Government's key policy objectives;
- highlight the public benefits generated by waterways so that they are fully appreciated by policy-makers and influencers, and by planners at all the different spatial levels;
- identify the key planning policy challenges and issues that need to be tackled in order to fully unlock the economic, social and environmental benefits of inland waterways and secure their long-term sustainability as a national asset;
- promote the need for a supportive planning policy framework for inland waterways at all the different spatial levels; and
- make recommendations to policy-makers and planners at the different spatial levels on how the planning system can help to secure the long-term future, and support the development, regeneration and improvement, of the inland waterways network.

The PAN explains that the inland waterways of Wales are national, regional and local cultural and natural assets. It recognises that they link urban and rural communities, as well as linking historic buildings and structures with the wider landscape and forming key strategic wildlife corridors. The Welsh inland waterways are helping to stimulate regional, sub-regional and local economies and are being used successfully as tools in improving community wellbeing and urban and rural housing offers by attracting and generating investment; in place-making and place shaping; and in delivering wider public benefit. They are also making an increasingly important contribution to the visitor economy, through a growing national awareness of the added value and commercial betterment deriving from the presence of waterways in developments.

You may find it of interest to familiarise yourself with the PAN at: <http://www.tcpa.org.uk/data/files/InlandWaterways.pdf>

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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British Waterway's comments should therefore be considered in the context of the above documents, policies, guidance and advice.

We wrote to you at the preferred options stage making comments on several aspects of the plan seeking to highlight in particular the important function that the Monmouthshire & Brecon canals have played and continue to play in the future of Newport. We note that some of our comments have been taken into consideration, for which we thank the Council.

Please find below British Waterway's specific comments on the Deposit Version of the Newport Local Development Plan 2011-2026.

I hope that these representations are clear and concise and that you will take them into account in the LDP process. Should you wish to discuss any aspect of these representations please contact me.

British Waterways would like to register our view that the plan is unsound in relation consistency test C1 and Coherence and effectiveness test CE1.

Our comments relate to Policy number CE4, paragraphs 7.18 and 7.20. We would like the Plan to include a new Policy and new text.

We would like our comments to be considered as written representations.

Policy CF4 Water Based Recreation

THE PROVISION AND ENHANCEMENT OF WATER BASED RECREATIONAL ACTIVITIES AND ESSENTIAL ANCILLARY FACILITIES ARE ENCOURAGED ESPECIALLY WITH THE RESTORATION OF THE MONMOUTHSHIRE AND BRECON CANAL.

Whilst British Waterways does not own or manage the section of the Monmouthshire and Brecon Canal as it runs through Newport we wish to support the aim of the policy. However we believe the Policy should be split as two different issues are involved. A policy is required to promote water based recreation and ancillary facilities but a second policy should be included to deal with the restoration of the canal.

We would suggest that the policy could be amended to read;

THE PROVISION AND ENHANCEMENT OF WATER BASED RECREATIONAL ACTIVITIES AND ESSENTIAL ANCILLARY FACILITIES ARE ENCOURAGED

Paragraph. 9. 18-19 as set out below then supports this shortened policy which relates to both canal and river.

9.18 Water based recreational activities can have significant benefits for regeneration and the economy and provide a valuable alternative source of recreation to more organised forms of sport and recreation, such as football and rugby.

9.19 Current water based recreation facilities include the River Usk, which is used for boating and yachting, but greater use is restricted by the tidal conditions. Other activities include angling at the fishing lakes at Bettws, the Monmouthshire and Brecon Canal, several reservoirs and along the sea wall. The River Usk and the Severn Estuary are sites of international importance for nature conservation. As such, any proposals arising from this policy must adhere to the other policies within the Plan, including GP5 which requires proposals to demonstrate how they avoid and mitigate negative impacts, ensuring that there are no significant adverse effects on international and European areas of nature conservation interest.

Specific Canal related policy

We would advocate a specific policy and supporting text to deal with the canal due to its multi-functional role and cross boundary nature.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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Planning Policy Wales Ch2.2.1 advocates that Issues of a strategic nature which affect more than one local planning authority will require consultation and collaboration between all authorities likely to be affected. Cross boundary work should be integrated into LDPs where relevant. We are pleased to note that paragraph 9.20 now provides some background into the history and importance of the canal to the area and that the Council is working with other authorities to seek the opening of the canal to full navigation. We are surprised that despite our comments at preferred Strategy stage not only is the canal not shown on the constraints and proposals map but that it does not have a specific policy which recognises its importance and seeks to guide development which may impact on it.

We suggest the following changes to the text;

9.20. The Monmouthshire and Brecon canal is an important multi – functional asset, with considerable potential to help create social and economic benefits for the area. It can act as a catalyst for urban regeneration, brings tourism to the area, provides an important sustainable transport route, natural habitat, health benefits and is a free recreational resource for all.

The Council recognises that the canal is an important cross boundary feature which has the potential to bring great benefits to the administrative areas through which it passes. The Council has entered into a partnership with Torfaen County Borough Council, Monmouthshire County Council, Brecon and Abergavenny Canals Trust and British Waterways, with the aim of re-establishing navigation on the full length of the canal between Newport and Brecon, linked with a proposed canal basin development at Crindau Pill.

The Council will encourage cross boundary working between these stakeholders to not only seek its restoration to full navigation but to ensure a coherent approach to the management of development which affects it.

To date, substantial restoration works have been implemented along the Monmouthshire and Brecon Canal. Restoration works in recent years have seen the Canal reopened to navigation between Pentre Lane on the main line of the Canal (at Lower Cwmbrian in Torfaen) down to the canal junction under the M4 to Barrack Hill, and up to the tail of Waen Lock on the Crumlin Arm. Restoration works at the Cefn Flight of Fourteen Locks, a Scheduled Ancient Monument, are on-going with the aim of restoring the entire historic flight.

We note that policy CE4 relates to development in a waterside location but the text of the policy seems to indicate that this relates solely to the River Usk. This could be amended as the policy is equally applicable to providing guidance for development alongside the Canal. As the canal undergoes restoration in the future it may experience similar development pressures and therefore we would advocate guidance at the earliest possible stage.

British Waterways has been working with other local authorities to recommend a Canal related policy which is in line with the guidance provided by the Town and Country Planning Association document 'Inland Waterways; unlocking the Potential and Securing the Future of Inland Waterways through the Planning System'. This document gives guidance to Local Planning Authorities on the 'waterproofing' of policy documents and identifies the need to tie in with emerging neighbouring LPA Policies due to the cross boundary nature of the canal and the new duty to co-operate.

British Waterways would suggest a new policy relating to development on, adjacent to or in the vicinity of the Monmouthshire and Brecon Canal which closely follows the advice given in the TCPA guidance. The following wording is based on a policy successfully used elsewhere and which now forms part of several adopted Core Strategies.

New Policy

Development adjacent to, or in the vicinity of, the Monmouthshire and Brecon Canal will be expected to:

- Be of a high quality design that integrates the canal into the development proposal in a way that treats the waterway as an area of usable space;
- Integrate the waterway, towing path and canal environment into the public realm in terms of the design and management of the development;
- Improve access to, along and from the waterway and improve the environmental quality of the waterway corridor;
- Optimise views of water and generate natural surveillance of water space through the siting, configuration and orientation of buildings, recognising that appropriate boundary treatment and access issues may differ between the towing path and offside of the canal, and;
- Improve the amenity of the canal. Development that would have an adverse impact on the amenity of the canal by virtue of noise, odour or visual impact will not be supported.

When off-site improvements to the canal are required these will be delivered by the developer through the use of "Grampian" conditions or planning obligations.

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test	
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1	1	I think the LDP is sound.	No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness C1 and CE1									
<i>Item Question</i>			<i>Tick-box reply</i>							
6 6	A new policy									Yes

35.D2/4.7/CE05 British Waterways 23/05/2012 E O M

Document: Deposit Plan, p.49, para.4.7

Policy: CE05

Summary: Refer to Monmouthshire & Brecon Canal in supporting text

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number CE5	
3 3	Paragraph or section number(s) 4.7	
7 7	A new paragraph or new text.	Yes
14 14	Representation We find the plan sound in relation to this policy but would request a minor change to the text in Paragraph 4.7. We support the policy but ask that the Monmouthshire and Brecon canal is included in the supporting text at a paragraph 4.7 after river and wildlife corridors.	
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
40.D1//SP05	Coedkernew Community Council			10/05/2012	<input type="checkbox"/>	P	S		M	

Document: Deposit Plan, p.18

Policy: SP05

Summary: Support Countryside, Green Belt and Green Wedge allocations west of Coedkernew

Item Question Representation Text

14 14 Representation

Members have asked me to write and make the following comments on the above.

We agree with the protection of the open countryside which you have indicated on the plan as a Green Wedge and especially the "Green Belt" West of Coedkernew protecting the area becoming an urban sprawl.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

40.D2//H15.01 Coe	Coedkernew Community Council			24/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 428/ Pound Hill

Delete Site

Policy: H15.01 Coedkernew

Summary: Object to the Gypsy and Transit Site at Coedkernew

Item Question Representation Text

14 14 Representation

Out only objection to the plan affecting Coedkernew is the proposed Gypsy and traveller transit accommodation, if agreed thos site will be built within a green wedge and will not meet the standards set out by the Welsh Government due to the lack of all the services required for the travelling communkity, set out Newport City Council documents, as well as the cost to develop the site and the ongoing debate regarding the widening of the M4, this site or part of the site could berequired in the future.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D1/1.14/SP16	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.27, para.1.14

Policy: SP16

Summary: Pleased with the Council's support of the SEWTA proposals.

Item Question Representation Text

3 3 Paragraph or section number(s)
Para 1.14 & 2.56

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

42.D2//SP06 Graig Community Council

28/05/2012 E S M

Document:Deposit Plan, p.19

Policy: SP06

Summary: Support the Green Belt

Item Question Representation Text

2 2 Policy Number
SP6

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D3//SP08	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.20

Policy: SP08

Summary: Support the SLA West of Rhiwderin.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP8	
14	14	Representation Council supports the designated Special Landscape Areas, specifically (ii) West of Rhiwderinm and all the countryside bordering the built up areas of Bassaleg and Rhiwderin. Council strongly objects to the development of any Candidate Sites within this SLA as it would contravene the objective of policy CE5 (Environmental Spaces, q.v.). Additionally the principle and local highways network is incapable of supporting further large-scale development.	
15	15	Do you want to speak at Public Examination?	Neither

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
1	1	I think the LDP is sound. Not Ticked

42.D4//SP12	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.24

Policy: SP12

Summary: Agrees cemeteries should be more environmentally friendly

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
3	3	Paragraph or section number(s) Para 2.48	
14	14	Representation Council agrees with the need to make cemeteries more environmentally friendly.	
15	15	Do you want to speak at Public Examination?	Neither

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
1	1	I think the LDP is sound. Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D5/2.58/SP16	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.27, para.2.58

Policy: SP16

Summary: Support J28 improvements, but feels feeder roads need upgrading aswell.

Item Question Representation Text

3 3 Paragraph or section number(s)
Para 2.58

14 14 Representation

Council feels the Junction 28 roundabout needs significant improvement and has been requesting this for the past 18 months to no avail, so are pleased to see this issue will be addressed. As this issue was given a public consultation in October 2001, Council urges that this be attended to at the earliest opportunity. Council are concerned that no commitments to improve the feeder roads into this junction have been made and that they will also need upgrading to prevent bottlenecks occurring elsewhere.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D6/2.60/SP16	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.27, para.2.60

Policy: SP16

Summary: Support Duffyn Link as a relief to the M4.

Item Question Representation Text

3 3 Paragraph or section number(s)
Para 2.60

14 14 Representation

Page 28, 2.60: Council broadly supports the Duffryn Link as a relief to the M4 and Junction 28 provided the appropriate steps are strictly monitored to have minimal impact on the surrounding environment.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

42.D7/4.56/CE14	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.60, para.4.56

Policy: CE14

Summary: Support renewable energy supplies.

Item Question Representation Text

3 3 Paragraph or section number(s)
4.56 & 4.58.

14 14 Representation

Page 60, 4.56 & 4.58: Council are pleased to support renewable energy supplies and applaud the fact that the protection of important sites will not be compromised.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
42.D8//H01.54	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.64

Site:

Policy: H01.54

Summary: Improvements to highway and infrastructure required for the Alcan site.

Item Question Representation Text

3 3 Paragraph or section number(s)
5.3

14 14 Representation

Page 62 & 64, 5.3: Council has some concerns regarding site H54 (Alcan). Proper consideration needs to be given to the fact that the site is only 2 feet above the river level so flooding would be a very real danger, and also that the development of the site would put an overbearing strain on the already inadequate road infrastructure and amenities of the local area which should be addressed prior to any development taking place. Also the Former Tredgar Park Golf Club site is of concern regarding the above problems of infrastructure, amenities and flood risk. Council are wary of the fact that these sites are earmarked for 700 and 150 units respectively, but past experience dictates that final figures for housing stock on these sites are likely to be much higher, posing even more stress on local facilities than expected. Council is of the view that large-scale development on these sites should not be permitted until the proposed improvements to Junction 28 are in place. As the tables show, if developments H12, H26, H44 & H54 are completed to just the numbers stated this will place a further 320 dwellings either within the Graig ward or on its borders, a very significant percentage when compared to the size and scale of the ward as it currently stands prior to these developments.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D9//H01	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.62

Policy: H01

Summary: Concerns about the impact infill and windfall sites could have on infrastructure capacity.

Item Question Representation Text

3 3 Paragraph or section number(s)
5.10

14 14 Representation

Page 65, 5.10: Council are concerned that although no windfall sites are designated, that potentially 750 houses on hidden plots of land could be built within the life of the LDP. This would significantly burden current infrastructure and amenities which are already under great stress. There are areas in the Graig ward which are currently garage blocks under the ownership of Newport City Homes which Council believe are earmarked for future development, as would some small green areas around the villages, these areas would be likely to fall into this category and be allowed for development which is of concern.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D10/7.7/T1	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	

Document: Deposit Plan, p.82, para.7.7

Policy: T1

Summary: Support the railway allocations.

Item Question Representation Text

3 3 Paragraph or section number(s)
7.7

14 14 Representation

Page 82, 7.7: Council fully support the Pye Corner railway link and hopes it will be completed as soon as possible with the adequate parking facilities needed. Council also supports the re-opening of the Ebbw Vale to Newport rail link as soon as feasible to breathe new life into the City, and generally supports the other several proposals listed.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D11/7.16/T4	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	

Document: Deposit Plan, p.84, para.7.16

Policy: T4

Summary: Supports that adequate car parking should be provided with all new parking.

Item Question Representation Text

3 3 Paragraph or section number(s)
7.16

14 14 Representation

Page 84, 7.16: Council supports that adequate off road parking should be provided at all new developments. It is a fact that households now have multiple cars per family. Many issues encountered by Council are as a result of residents not being able to park off-road.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D12/9.26/CF07	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	

Document: Deposit Plan, p.103, para.9.26

Policy: CF07

Summary: Supports protection of allotments.

Item Question Representation Text

3 3 Paragraph or section number(s)
9.26

14 14 Representation

Page 103, 9.26: Council fully supports that allotments be provided and protected. Having lost one site recently, Council has a commitment to the retention of their only existing site and are about to extend it. Council notes that no mention of further provision of allotments is mentioned in the LDP, which the Welsh Government was promoting.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D13/9.50/CF13	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.108, para.9.50

Policy: CF13

Summary: Supports provision of leisure facilities and wishes to see increased leisure provision as part of the Alcan development.

Item Question Representation Text

3 3 Paragraph or section number(s)
9.50 & 9.53

14 14 Representation

Page 108, 9.50 & 9.53: Council fully supports the provision of leisure facilities, and stresses that facilities in the Graig ward are insufficient to meet demand at present. Council urges that should the Alcan site be developed, increased leisure facilities for locals should be a priority.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

42.D14/12.3/Monit Graig Community Council

28/05/2012

E

C

M

Policy: Monitoring Framework

Summary: Request a copy of the Annual Monitoring Report.

Item Question Representation Text

3 3 Paragraph or section number(s)
12.3

14 14 Representation

Page 117, 12.3: Council requests that Community Councils be allowed a copy of the Annual Monitoring Report.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D15//SP12	Graig Community Council			28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.24

Policy: SP12

Summary: Graig needs extra facilities before further development takes place.

Item Question Representation Text

14 14 Representation

General comments regarding the Graig ward: There are feelings that the Graig ward's village identity is being gradually lost in a "fill it 'til it bursts" approach, local amenities and the infrastructure for the current number of residents are extremely poor and are worsening with each new site being developed, the quality of life is deteriorating at pace. Forward planning for extra facilities and infrastructure for the ward must be a priority before any further large-scale development takes place.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
42.D16//Overview	Graig Community Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Policy: Overview

Summary: Visions and objections do not match the perception of Newport.

Item Question Representation Text

3 3 Paragraph or section number(s)
Visions and objectives.

14 14 Representation

Overview of the document as a whole:

Criticisms:

The vision & objectives do not match the widely held perception that Newport is in decline. Its transport infrastructure is fragmented, its cultural & sporting facilities meagre & the focal point for residents to meet & shop is dismal & shabby. Such a situation will not attract the necessary investment.

The LDP must demonstrate a comprehensive, integrated scheme, to develop & re vitalise Newport with an emphasis on quality, in which its citizens can believe.

There must be an integrated transport system: train, bus, safe cycle routes & walkways, adequate car parking as a first step to minimise environmental impact.

Praise:

Newport's waste collection & disposal facilities are excellent.

The parks, gardens & flower displays are excellent.

The Wetlands are a wonderful feature.

Tredegar House is a little gem to be nurtured.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
43.D1//SP12	Langstone Community Council			25/05/2012	<input type="checkbox"/>	E	S		M	

Document: Deposit Plan, p.24

Site:

New Site

Policy: SP12

Map: Proposals Plan - East

Summary: Supports the inclusion of Langstone Court in the development plan for non-residential, leisure development.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number SP12	
4	4	The Proposals Map Proposals Map - East	
11	11	Site Name Langstone Court Road	
12	12	Site Reference 2051.C1	
14	14	Representation Candidate site 2051.C1 Langstone Court Road - The Council note NCCs response which is to reject all of the Candidate sites proposals for residential development outside the Village boundaries of Langstone and Llandevaud; and whilst LCC supports this approach it also notes residents concerns at the lack of amenities within the ward. However in regard to candidate site 2051.C1 Langstone Court Road Proposed Community Centre and associated facilities on 1.74ha. Langstone Community Council supports this candidate site being included in the Deposit Plan as a non-residential development as it would provide much needed leisure/sports facilities for the community. Whilst the council notes NCC comments that extending the boundary would set precedent it believes the provision of open/sports space is important. There are currently no other facilities other than a small park and LCC is not aware of any other suitable land that could be converted for this use. LCC would therefore urge NCC to reconsider its decision and to include this candidate site, for sports & leisure use, with no associated residential use being premitted.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
43.D2/W1	Langstone Community Council			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.113

Site: 424/ South of Llanwern Steelworks

Delete Site

Policy: W1

Summary: Objects to the Waste allocation, South of Llanwern.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number W1	
7	7	A new paragraph or new text.	Yes
14	14	Representation The Council are concern by the manner in which support for this facility has been included in the Deposit Plan and request that: (i) NCC follow its existing Waste Strategy Plan which calls for mechanical and biological treatment (MBT) facilities to be used for the treatment of the areas residual waste. (ii) NCC removes all text implying that the Deposit Plan will endorse a mass-burn incinerator in Newport or its vicinity. (iii) Remove all references to a regional waste disposal or processing facility at Llanwern (iv) Remove all references approving a waste strategy based on Prosiect Gwyrdds shortlist of two incinerators.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
43.D3/CF15	Langstone Community Council			25/05/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.108

Policy: CF15

Summary: Clarify how the need for Welsh Medium Educaiton will be met through the Deposit Plan.

Item Question Representation Text

2 2 Policy Number
CF15

14 14 Representation

The council note that whilst it was stated in paragraph 9.56 that there would be an additional need for Welsh Medium Primary Schools within the life of the plan no provision for Welsh Medium Secondary Schools within the Newport area had been included in the plan. The council seek confirmation that this area of Welsh Medium Education has been considered and request that details of the how this increasing need will be addressed to be included in the deposit plan. There are currently 3 feeder schools within Newport and it is understood that Ysgol Gyfun Gwynllyw the Welsh-medium comprehensive school located in Trevechin, Pontypool, to which pupils are currently sent has indicated that it is oversubscribed and will not be accepting pupils from outside the area from Sept 2012/13.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Item Question

6 6 A new policy

Tick-box reply

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
43.D4//SP12	Langstone Community Council			25/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.24

Site: 298/ Langstone Court

New Site

Policy: SP12

Summary: Want community facility in Langstone

Item Question Representation Text

14 14 Representation

SP12 (i) (iv) (Receipt received)

In regard to candidate site 2051.C1 Langstone Court Road Proposed Community Centre and associated facilities on 1.74ha, Langstone Community Council support this candidate site being included in the Deposit Plan as it would provide much needed leisure/sports facilities for the community. Whilst noting NCC comments that extending the boundary would set precedent it believes the provision of open/sports space is important. There are no other facilities other than a small park and LCC is not aware of any other suitable land that could be converted for this use.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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47.D1//H15.01 Coe	Marshfield Community Council			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.71

Site: 428/ Pound Hill

Delete Site

Policy: H15.01 Coedkernew

Summary: Object to the transit Gypsy and Traveller site proposed at Pound Hill

Item Question Representation Text

14 14 Representation

During the public consultation a number of objections were made by local residents expressing concern at the allocation of land for a transit traveller site in a location known as Pound Hill. Numerous reasons were made for the objections which included:

I. Access to and from the A48 particularly given the number of historical accidents in the vicinity of the junction with the A48.

II. We are led to believe that it is recommended such traveller sites should not be located near dual carriage ways and should be on level land; neither of which apply to Pound Hill as it is located close to a dual carriage way and on a steep hill.

III. The proposed site has no mains drainage connection which although could be resolved with significant infrastructure upgrade would need to be considered in the costs.

IV. A similar site located in Bristol was cited by Newport City Council at the consultation as an example of a good example of a small traveller transit site. It was then revealed that no-one from NCC had actually been to see this site during operation and a resident at the meeting, who had knowledge of the site in operation highlighted the poor standards and affect it had had on local residents in Bristol.

V. There was concern raised by residents regarding crime waves as new families come and go.

VI. Concern was expressed by some residents regarding the development growth i.e. site designated for one purpose which evolves into something quite different over time.

VII. A concern was raised that children based on this site could potentially be educated in Marshfield Primary School which is already over subscribed.

Marshfield Community Council support these views and consider that the proposal to locate a traveller site in this location is unsuitable and should be removed from the plan.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
47.D2//SP12	Marshfield Community Council			28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.24

Policy: SP12

Summary: Wishes to see some land allocated for a doctor's surgery in Marshfield.

Item Question Representation Text

14 14 Representation

During the public consultation a number of residents expressed a wish to see some land allocated for a doctors surgery/medical centre. Whilst it is accepted that NCC has no powers to drive any such development the allocation of some suitable land would signify intent and perhaps generate some interest from a suitable party.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

47.D3//SP06	Marshfield Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.19

Policy: SP06

Summary: Support brownfield allocations and Green Belt between Cardiff and Newport

Item Question Representation Text

14 14 Representation

We support the use of brownfield sites as identified for residential development to maintain the green belt in and around Marshfield and Castleton.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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47.D4//SP16	Marshfield Community Council			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.27

Policy: SP16

Summary: Support the completion of the Duffryn Link.

Item Question Representation Text

14 14 Representation

We support the proposal to complete the Duffryn link road to relieve the M4 during times of heavy congestion or incidents.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

48.D1//SP06	Michaelstone-y-Fedw C. Council			27/05/2012	<input type="checkbox"/>	E			M	
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Document:Deposit Plan, p.19

Policy: SP06

Summary: Supports inclusion of areas adjacent A48 and M4 as Green Belt.

Item Question Representation Text

14 14 Representation

The designation of the area bounded by the A48(M) and the M4 as Green Belt is most welcome together with the designation of the remainder of our undeveloped land as Green Field.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
48.D2//H15.01 Coe	Michaelstone-y-Fedw C. Council			27/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.71

Site: 428/ Pound Hill

Delete Site

Policy: H15.01 Coedkernew

Summary: Objects to allocation of Gypsy and Traveller site

Item Question Representation Text

14 14 Representation

The proposed facility for "Travellers" adjacent to Pound Hill/Newport Road is vigorously opposed. There are in our opinion adequate "brown land" sites within the City Council boundaries better suited for this type of development. Placing this on a main road access to the City is not appropriate and in addition it does not meet the guidelines for such developments.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
49.D1//H15.02	Nash Community Council			30/04/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objects to the Gypsy and Travellers allocation at Broadstreet Common and Queensway Meadows

Item Question Representation Text

14 14 Representation

I am objecting on behalf of Nash Community Council to the proposal for 3 Gypsy/Traveller sites within our local community of Nash. Two on Broadstreet Common and one on Queensway Meadows.

Already the Welsh Government and Newport City Council have already placed an *official* temporary site on Queensway Meadows without going through the planning process.

The main reasons for objection are against Policies H15, H16 & H17 in the Local Development Plan.

The two sites on Broadstreet Common are in the middle of a flood plain and SSSI area. There is no mains drains and also very deep reens each side of the road. There is no street lighting and no pavements, which makes it dangerous to walk on and there is a lot of traffic speeding through this road from Magor. The school is not within walking distance.

It will dominate the local community which is only a small village. Will they pay the Council Tax which Nash have to pay?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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49.D2//H16.02	Nash Community Council			30/04/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Object to Gypsy and Traveller Sites in Nash at Broadstreet Common and Queensway Meadows

Item Question Representation Text

14 14 Representation

I am objecting on behalf of Nash Community Council to the proposal for 3 Gypsy/Traveller sites within our local community of Nash. Two on Broadstreet Common and one on Queensway Meadows.

Already the Welsh Government and Newport City Council have already placed an *official* temporary site on Queensway Meadows without going through the planning process.

The main reasons for objection are against Policies H15, H16 & H17 in the Local Development Plan.

The two sites on Broadstreet Common are in the middle of a flood plain and SSSI area. There is no mains drains and also very deep reens each side of the road. There is no street lighting and no pavements, which makes it dangerous to walk on and there is a lot of traffic speeding through this road from Magor. The school is not within walking distance.

It will dominate the local community which is only a small village. Will they pay the Council Tax which Nash have to pay?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
49.D3//H16.03	Nash Community Council			30/04/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Object to Gypsy and traveller sites in Nash at Broadstreet Common and Queensway Meadows

Item Question Representation Text

14 14 Representation

I am objecting on behalf of Nash Community Council to the proposal for 3 Gypsy/Traveller sites within our local community of Nash. Two on Broadstreet Common and one on Queensway Meadows.

Already the Welsh Government and Newport City Council have already placed an *official* temporary site on Queensway Meadows without going through the planning process.

The main reasons for objection are against Policies H15, H16 & H17 in the Local Development Plan.

The two sites on Broadstreet Common are in the middle of a flood plain and SSSI area. There is no mains drains and also very deep reens each side of the road. There is no street lighting and no pavements, which makes it dangerous to walk on and there is a lot of traffic speeding through this road from Magor. The school is not within walking distance.

It will dominate the local community which is only a small village. Will they pay the Council Tax which Nash have to pay?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
49.D4//H17	Nash Community Council			30/04/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection raised against Policies H15, H16 & H17 for proposed Gypsy and Traveller Sites

Item Question Representation Text

14 14 Representation

I am objecting on behalf of Nash Community Council to the proposal for 3 Gypsy/Traveller sites within our local community of Nash. Two on Broadstreet Common and one on Queensway Meadows.

Already the Welsh Government and Newport City Council have already placed an *official* temporary site on Queensway Meadows without going through the planning process.

The main reasons for objection are against Policies H15, H16 & H17 in the Local Development Plan.

The two sites on Broadstreet Common are in the middle of a flood plain and SSSI area. There is no mains drains and also very deep reens each side of the road. There is no street lighting and no pavements, which makes it dangerous to walk on and there is a lot of traffic speeding through this road from Magor. The school is not within walking distance.

It will dominate the local community which is only a small village. Will they pay the Council Tax which Nash have to pay?

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
53.D1//SP10	Rogerstone Community Council	Asbri Planning		25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Site:

Policy: SP10

Summary: Brownfield led strategy is too restrictive.

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number SP10		
11	11	Site Name Land at Bethesda Close, Rogerstone.		
12	12	Site Reference 53.C1		
14	14	Representation Policy SP10 – House Building Requirement, is objected to as the 'brownfield' led strategy in restricting appropriate levels of development in sustainable locations on suitable undeveloped sites within the urban area, with an emphasis on previously developed land, does not provide for a sufficient range and choice of housing. As such, the criteria should be extended to include appropriate development on open areas of land in the urban area, which are not required for amenity or recreation purposes and which have capacity to accommodate suitable housing schemes in preference to extending into the wider countryside. This point is expanded upon in the objections to Policy H1. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site. Additional Information Submitted - Available on Request		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness CE2, CE4		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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53.D2//CE05	Rogerstone Community Council	Asbri Planning		25/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.49

Site: 444/ Bethesda Road

Delete Site

Policy: CE05

Summary: Environmental Spaces allocation on land at Bethesda Close should be removed.

Item Question Representation Text

4 4	The Proposals Map	Yes
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11 11	Site Name Land at Bethesda Close, Rogerstone.	
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12 12	Site Reference 53.C1	
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14 14	Representation	
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Environmental Spaces are described as "Sites having existing importance for their visual qualities, as wildlife habitats or for recreational or amenity purposes." Such Environmental Spaces are defined in the LDP Background Paper (February 2012) as Local Nature Reserves, SINCS, Ancient Woodlands, Commons and Village Greens, Accessible Natural Greenspace and Amenity Areas. The site is not publicly accessible and has none of the qualities which the above are associated with. Its inclusion within such an area is, therefore, objected to.

The submission site is not publicly accessible and as such has no recreational value. One of the main reasons for designating such spaces, as stated in supporting paragraph 4.10 is their recreational value. Furthermore the development would not detrimentally affect the current landscape or biodiversity value, and would not result in severance of areas of biodiversity interest. The safeguarding of that part of the site which has some ecological value with the addition of the proposed enclosed play area would, therefore, represent an improvement in respect of play provision, whilst maintaining some of the site's open-ness.

It is considered, therefore, that the inclusion of the site within an Environmental Space is not appropriate or justified by any firm evidence, but that in any event the proposals would accord with the provisions of Policy CE5 for the reasons given above.

The Proposals Map is also objected to on the above basis.

The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.

Additional Information Submitted - Available on Request

15 15	Do you want to speak at Public Examination?	Yes
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16 16	Subject to speak on at Examination To put the case for the site's inclusion and to present evidence directly before the Inspector.	
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Item Question Soundness Test

1 1	I think the LDP is sound.	No
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13 13	Test of Soundness CE2, CE4	
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Item Question

Tick-box reply

8 8	Add a new site.	Yes
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
53.D3//H01	Rogerstone Community Council	Asbri Planning		25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 333/ Bethesda Close

New Site

Policy: H01

Map: Proposals Plan - West

Summary: More provision should be made for specific housing sites instead of a windfall allowance.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		H1	
4	4	The Proposals Map	Yes
11	11	Site Name	
		Land at Bethesda Close, Rogerstone.	
12	12	Site Reference	
		53.C1	
14	14	Representation	
		Supporting paragraph 5.10 refers to such an estimate of 50 units a year (750 in total over the Plan period) which may come forward as part of a 'windfall allowance' for infill and windfall sites. With urban and settlement boundaries remaining as they were from the Unitary Development Plan, such figures are unlikely to be realised given the number of windfall sites already associated with large brownfield releases. More provision should therefore be made for specific housing land allocations on sites such as that being promoted at Bethesda Close, where evidence through planning application and appeal procedures has demonstrated that the Environmental Space designation is not necessary.	
		Policy H1 is therefore objected to on the above basis and on the grounds that the submission site is not included as a housing land allocation under the policy.	
		The Proposals Map is also objected to on the above basis.	
		The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.	
		Additional Information Submitted - Available on Request	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination	
		To put the case forward for the site's inclusion and to present evidence directly before the Inspector.	
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness	
		CE2, CE4	

Item Question

Tick-box reply

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
8 8	Add a new site.		Yes							

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D1	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.0

Summary: General introduction to the objections that are dealt with in more detail within specific representations.

Item Question *Representation Text*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Thank you for consulting the Countryside Council for Wales (CCW) on the Newport Deposit Local Development Plan (LDP). Our comments are made in the context of our role as statutory advisor to Government on matters pertaining to the natural heritage of Wales and its inshore waters, and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. CCW welcomes the preparation of the plan and the work that has been undertaken by your authority. We particularly welcome the policies protecting the natural environment and the aim to regenerate brown field sites. We also welcome the SA/SEA and HRA that have been undertaken for the Plan. A separate response has been submitted to you for each of those assessments. However, although we welcome much of the Plan's content we have serious concerns about parts of it and some of the contradictions within it, and consider that as drafted those parts fail to meet a number of the tests of soundness, most notably CE1, CE2 and C2. We are particularly concerned about the number of allocations within or likely to have implications for the Gwent Levels suite of Sites of Special Scientific Interest (SSSI), notably allocations H16(iii) – The former Army Camp Site, Pye Corner, CF15(i) – South of Percoed Lane, Duffryn, EM1(i) – Duffryn, EM1(ii) – East of Queensway Meadows, the safeguarding of land for a 'M4 Relief Road' and a 'Duffryn Link Road'. The Wildlife and Countryside Act 1981, as amended, (translated into planning policy through Planning Policy Wales) places a duty on your authority to take reasonable steps.

Consistent with the proper exercise of your functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. The loss of and damage to significant parts of several SSSIs for LDP allocations, particularly when there appears to be alternative solutions elsewhere in the Plan area, is clearly contrary to that duty, and therefore contrary to national policy and test of soundness C2. We therefore advise that allocations likely to result in direct loss of, or that would fail to conserve and enhance a SSSI are deleted from the Plan.

Other key points of concern to CCW are:

- the lack of aspiration in the Plan's vision for the natural environment;
- failure to identify that not all brownfield sites will be suitable for development;
- the failure to incorporate a number of amendments agreed by the authority in the Initial Consultation Report (February 2012);
- the realistic delivery of the proposed level of housing growth;
- the significant over allocation of employment land;

More detailed comments are provided in the attached Annex. An LDP response form is also enclosed. Given our concerns over the proposed allocations within the SSSIs, and the inaccurate guidance included in the Plan relating to the retention of habitat alongside the reens within the Gwent Levels SSSIs, we would welcome discussion with your authority about these issues at the earliest opportunity. We trust our comments are of assistance to you. However, should you have any queries or would like to discuss any of them in more detail, please do not hesitate to contact Sue Howard in our St Mellons Office or Karen Maddock-Jones at our Llandarcy office.

We do not consider that the following paragraphs, objectives, and policies of the Plan meet the Tests of Soundness, and should be amended:

- Paragraph 0.1: Vision (amend text to meet Tests of Soundness CE1, C2, and C4);
- Paragraph 1.24 (amend text to meet Test of Soundness C2);
- Objective 6 (amend objective to meet Test of Soundness C2 and CE1);
- Policy SP5: Countryside (amend policy to meet Test of Soundness C2);
- Policy SP10: House Building Requirement (amend policy to meet Test of Soundness CE2);
- Policy SP11 Eastern Expansion Area (amend Proposals Map to meet Test of Soundness CE1);
- Policy SP16: Major Road Schemes (amend policy and supporting text to meet Tests of Soundness C2 and CE2);
- Paragraph 2.61 (amend text to meet Test of Soundness CE2);
- Policy SP18: Employment Sites (amend policy and supporting text to meet Tests of Soundness CE2 and C2);
- Policy GP3: General Development Principles (amend supporting text to meet Test of Soundness C2);
- Paragraph 3.27 (amend Proposals Map to meet Test of Soundness C2);
- Policies CE1: Development in the Green Belt and CE2 Development in Green Wedges (amend policies to meet Test of Soundness C2);
- Policy CE8: Historic Landscapes, Parks, Gardens and Battlefields (amend Proposals Map and supporting text) (to meet Tests of Soundness CE1 and C2);
- Paragraph 4.58 (provide additional information to meet Test of Soundness CE3);
- Allocations H1(56) & H1(57) (delete allocations to meet Tests of Soundness CE1, CE2, C2);
- Policy H15 Gypsy and Traveller Transit Accommodation (provide further information to meet Test of Soundness C2 and CE2);
- Policy H16(iii): Former Army Camp Site, Pye Corner, Nash (delete allocation to meet Tests of Soundness CE1 and C2);

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- Policy H16(ii) Former Army Barracks, Pye Corner, Nash (amend supporting text to meet Test of Soundness C2);
- Policy EM1: Employment Land Allocations (amend policy and supporting text, and delete allocations EM1(i) and EM(ii) to meet Tests of Soundness CE1, CE2 and C2);
- Policy EM2(xii) Alcan Site (amend supporting text to meet Tests of Soundness CE2 and CE3);
- Policy T1: Railways (amend policy to meet Test of Soundness C2);
- Policy CF10: Celtic Manor (amend supporting text to meet Tests of Soundness C2 and CE1);
- Paragraph 9.45 (amend text to meet Tests of Soundness C2 and CE1);
- Policy CF15(i): South of Percoed Lane, Duffryn (mapped as CF13(i) on the Proposals Map) (delete allocation to meet Test of Soundness C2);
- Policy CF15(vi): Duffryn High (Mapped as CF15(vi) on the Proposals Map)(amend supporting text to meet Tests of Soundness C2 and CE1);
- Policy M1: Safeguarding of Mineral Resource (amend supporting text to meet Test of Soundness CE1);
- Policy W1: Waste Site Allocations (amend supporting text to meet Tests of Soundness C2 and CE3);
- Policy W3: Waste Management Proposals (amend supporting text to meet Tests of Soundness CE1 and C2); and
- Monitoring Framework (to meet Test of Soundness CE3).

Please see our comments made to Paragraphs 3.22 and 3.23 (Test of Soundness CE1), and Policy CE12 in relation to recommended amendments to the Proposals Map (Test of Soundness C2).

Whilst we consider that the following paragraphs and policies meet the Tests of Soundness, we recommend that they are amended to improve the clarity of the Plan:

- Paragraph 0.9;
- Policy SP17: Employment Land Requirements;
- Policy GP5: General Development Principles – Natural Environment;
- Policy CE5: Environmental Spaces;
- Policy CE13: Coastal Zone;
- Paragraph 4.56;
- Paragraph 4.62;
- Policy H1: Housing Sites;
- Allocation H1(47);
- Supporting text to Policies H10, H12, and H13;
- Policy EM2: Regeneration Sites;
- Policy EM3: Alternative Uses of Employment Land

Please also our comments to Policy H1 in relation to the Proposals Map.

Please see our detailed comments in the accompanying letter (dated 13 June 2012)

15	15	Do you want to speak at Public Examination?	No
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	No
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D2//Overview	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.1

Policy: Overview

Summary: Plan fails to meet Tests of Soundness C4, CE1 and C2

Item Question Representation Text

14 14 Representation

Whilst we welcome the reference to the environment in the Vision for the Local Development Plan (LDP), as previously stated in our responses to the Vision and Preferred Strategy consultations, we do not consider that the reference to communities living in harmony in a unique natural environment translates the authority's aspiration to protect the environment set out on page 19 of Newport's Community Strategy 2010-2020, or the requirements of national policy set out in paragraph 3.3.1 of TAN 5 Nature Conservation and Planning, and that as drafted the Vision fails to provide a clear aspiration for the county's natural heritage during the Plan period.

Further, it is not clear where the reference to unique environment derives from. Having considered responses to the LDP Vision consultation, whilst it is suggested in one response that the vision should be unique and totally distinct to Newport, there is no suggestion that reference should be made to a unique environment, particularly without any aim to implement your authority's duties to protect and enhance elements of it.

We therefore recommend that the Plan's vision is amended to include an ambition to both protect and enhance the county's unique natural environment to enable it to meet Tests of Soundness C4, CE1 and C2.

15 15 Do you want to speak at Public Examination?
Not Ticked

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
C4, CE1 & C2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D3/0.9/CE05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.49, para.0.9

Policy: CE05

Summary: Refer to corridors as well as green spaces.

Item Question Representation Text

7	7	A new paragraph or new text.	Yes
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14	14	Representation	
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Whilst we welcome the recognition of the multiple benefits provided by green spaces and the intention to protect such spaces, we are concerned that other important spaces such as river and stream corridors do not appear to be encompassed within the term green spaces. To provide greater clarity we therefore recommend that the term is amended to read 'environmental green spaces and corridors'.

15	15	Do you want to speak at Public Examination?	No
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Item Question Soundness Test

1	1	I think the LDP is sound.	Neither
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Not Ticked

54.D4/0.18/SP16	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Policy: SP16

Summary: Concerns with Policies SP16 and T1.

Item Question Representation Text

3	3	Paragraph or section number(s)	
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Para 0.18.

14	14	Representation	
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Please see comments below for Policies SP16 and T1 relating to the highway proposals at Queensway and the Duffryn Link and the railway station at Coedkernew.

15	15	Do you want to speak at Public Examination?	No
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Item Question Soundness Test

1	1	I think the LDP is sound.	Neither
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Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D5/1.23/Objecti	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.9, para.1.23

Policy: Objective 1

Summary: Considered to meet the Test of Soundness CE1.

<i>Item Question</i>	<i>Representation Text</i>	
3 3	Paragraph or section number(s)	
1.23		
14 14	Representation	
	We consider that the objective meets Test of Soundness CE1.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D6/1.24/SP01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.14, para.1.24

Policy: SP01

Summary: Plan should make clear that not all brownfield sites are suitable for development.

<i>Item Question</i>	<i>Representation Text</i>	
3 3 1.24	Paragraph or section number(s)	
7 7	A new paragraph or new text.	Yes
14 14	Representation Whilst we welcome the principle of focussing development on previously used land, it should be noted in the LDP, that as identified in Planning Policy Wales (para 4.8.1), not all previously developed land is suitable for development because of the presence of protected species or valuable habitats that have frequently regenerated at the site. Allocations should therefore seek to avoid or mitigate adverse impacts on the natural environment. Although we note the addition in the text of the quotation from the Wales Spatial Plan that refers to the integration of social, environmental and economic objectives in the context of more efficient natural resources, it fails to clarify that not all previously used sites will be suitable for development. To meet test of soundness C2, we recommend that the text is clarified to state that not all previously used sites will be suitable for development.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13 C2	Test of Soundness	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D7//Objective 2	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.9

Policy: Objective 2

Summary: Objective 2 considered to meet the test of Soundness CE1 & C2.

Item Question *Representation Text*

14 14 Representation

Climate Change - Objective 2; Economic Growth - Objective 3; Housing - Objective 4; and Conservation on the Environment (1) - Objective 5
We consider that the objectives meet the Tests of Soundness CE1 and C2.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D8//Objective 6	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Policy: Objective 6(2)

Summary: Lack of clarity in the range of natural heritage features the objective applies to.

Item	Question	Representation Text	Soundness Test
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2	2	Policy Number	
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		Objective 6	
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7	7	A new paragraph or new text.	Yes
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14	14	Representation	
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As stated in our previous comments to this objective (letter dated 5 March 2010, Preferred Strategy Consultation), we consider there is a lack of clarity in the range of natural heritage features this objective refers to. Further we consider there should also be an explicit objective for the county's landscape. We therefore recommend that the objective is amended to:

(i) include a reference to protect and enhance the county's landscape;

(ii) replace the reference to 'non-protected species and habitats' with 'habitats and species of principle importance for biodiversity in Wales'; and

(iii) include a reference to designated nature conservation sites, and /or a definition of what is meant by protected habitats.

In the Council's Initial Consultation Report February 2012, 54.P10 The Council agreed with the points raised by CCW and stated that the LDP would be amended accordingly. However, the necessary amendments have not been made to the Deposit Plan. To meet tests of soundness C2 and CE1 we recommend that the relevant amendments are made to the LDP.

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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		C2 & CE1	
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D9//Objective 7 Countryside Council For Wales

13/06/2012

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Document:Deposit Plan, p.11

Policy: Objective 7

Summary: Objectives 7, 8, 9 and 10 - meet CE1 and C2 Tests of Soundness

Item Question Representation Text

14 14 Representation

Community Facilities and Infrastructure - Objective 7; Culture and Accessibility – Objective 8; Health and Well-being – Objective 9; and Waste – Objective 10 We consider that the objectives meet Tests of Soundness CE1 and C2.

15 15 Do you want to speak at Public Examination?

No

16 16 Subject to speak on at Examination
Objective 7, 8, 9 and 10

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D10/2.3/ Countryside Council For Wales

13/06/2012

E

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Document:Deposit Plan, p.13, para.2.3

Summary: Welcome clarification that the plan should be read as a whole.

Item Question Representation Text

14 14 Representation

Spatial Strategy and Strategic Policies
Paragraph 2.3

We welcome the clarification that the plan should be read as a whole.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D11/2.5/Overvi	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.1, para.2.5

Policy: Overview

Summary: Welcome protection of landscape, conservation of protected sites and species.

Item Question Representation Text

3 3 Paragraph or section number(s)
Paragraph 2.5 - Spatial Strategy

14 14 Representation

We welcome the inclusion of the protection of the landscape, conservation of protected sites and species and encouragement of biodiversity as part of the Plan's spatial strategy, and consider that this meets test of soundness C2.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D12//SP01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.14

Policy: SP01

Summary: SP1 meets test of soundness CE1 and C2.

Item Question Representation Text

2 2 Policy Number
SP1 Sustainability

14 14 Representation

We consider that the policy meet Tests of Soundness CE1 and C2.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D13/2.8/SP01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.14, para.2.8

Policy: SP01

Summary: Plan should make clear not all brownfield sites are suitable for development.

Item Question Representation Text

3 3 Paragraph or section number(s)
2.8

14 14 Representation

Please see comments to paragraph 1.24 above

"Whilst we welcome the principle of focussing development on previously used land, it should be noted in the LDP, that as identified in Planning Policy Wales (para 4.8.1), not all previously developed land is suitable for development because of the presence of protected species or valuable habitats that have frequently regenerated at the site. Allocations should therefore seek to avoid or mitigate adverse impacts on the natural environment.

Although we note the addition in the text of the quotation from the Wales Spatial Plan that refers to the integration of social, environmental and economic objectives in the context of more efficient natural resources, it fails to clarify that not all previously used sites will be suitable for development.

To meet test of soundness C2, we recommend that the text is clarified to state that not all previously used sites will be suitable for development."

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D14//SP02	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.16

Policy: SP02

Summary: SP2, SP3 and SP4 are considered to meet CE1 and C2.

Item Question *Representation Text*

2 2 Policy Number

SP2 Health; SP3 Flood Risk and SP4 Water Resources.

14 14 Representation

We consider that the policies meet Tests of Soundness CE1 and C2.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D15//SP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	P		M	

Document: Deposit Plan, p.18

Policy: SP05

Summary: Replace 'Area' with 'Environment'.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP5	
7	7	A new paragraph or new text.	Yes
14	14	Representation Please see CCW's previous comment on this policy (formerly SP4), and the Council's response which agreed to the suggested amendment (54.P23 Initial Consultation Report February 2012). (To meet test of soundness C2). For ease of reference our previous comments are copied here: "To incorporate natural and built environment interests as well as local amenity, CCW recommends that in the 5th line, the word 'Area' is replaced with 'Environment'."	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D16//SP06	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.19

Policy: SP06

Summary: Support Green Belt and Green Wedge allocations.

Item Question Representation Text

2 2 Policy Number
SP6 & SP7

14 14 Representation

We support the principle of identifying a Green Belt and Green Wedges to prevent the coalescence of settlements, and consider that they reflect a logical flow from Objectives 1, 5, and 6 of the Plan in meeting Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D17//SP08	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.20

Policy: SP08

Summary: Welcome the SLA designations.

Item Question Representation Text

2 2 Policy Number
SP8 - Special Landscape Areas

14 14 Representation

We welcome the designation of SLAs and consider they meet test of soundness CE1 and C2.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D18//SP09	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.21

Policy: SP09

Summary: Welcome the policy SP9

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2 2	Policy Number	SP9 Conservation of the Natural, Historic and Built Environment.	
14 14	Representation	We welcome the policy and consider that it meets Tests of Soundness CE1 and C2.	
15 15	Do you want to speak at Public Examination?		No
1 1	I think the LDP is sound.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D19//SP10	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Policy: SP10

Summary: Concerns over the levels of housing growth

Item Question *Representation Text*

2 2 Policy Number
SP10 House Building Requirement

14 14 Representation

The Housing Background Paper (April 2012) demonstrates that the average annual historic completion rates for the period 1996 – 2011 (464 units p.a.) were notably lower than the number of average annual completions that will be required to deliver the proposed overall level of growth in the Plan (583 units p.a.).

Whilst we support the principle of phasing the release of housing land, and welcome the reduced housing figure that is proposed for the Plan, we continue to have concerns regarding the realistic delivery of the proposed level of housing growth identified for the Plan period, particularly as the numbers required for the 2 latter phases will require 5 year average completion rates higher than those experienced in any 5 year period over the last 25 years.

We therefore have concerns regarding the realistic delivery of the proposed level of housing growth, and that this part of the Plan will need to set out contingency mechanisms if housing figures are not delivered as phased to meet Test of Soundness CE2.

15 15 Do you want to speak at Public Examination? No

Item Question *Soundness Test*

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D20//SP11	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.23

Policy: SP11

Map: Proposals Plan - East

Summary: Plan and Proposals Plan should clearly show the boundary of the EEA.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP11 - Eastern Expansion Area	
4	4	The Proposals Map Proposals Map East	Yes
14	14	Representation Whilst we note the information provided, and the identification of the allocation adjacent to Llanwern village on the Proposals Map, we recommend, for improved clarity, that the Plan and the Proposals Map should clearly identify the full boundary of the Eastern Expansion Area. (To meet test of soundness CE1).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1.	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D21//SP12	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.24

Policy: SP12

Summary: Policy meets Test of Soundness CE1.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number SP12 Community Facilities and Requirements.	
14 14	Representation We consider that the policy meets Test of Soundness CE1.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

54.D22//SP13	Countryside Council For Wales			13/05/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.25

Policy: SP13

Summary: Meets Test of Soundness CE1

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number SP22	
14 14	Representation We consider that the policy meets test of soundness CE1, and look forward to the opportunity to comment on the emerging CIL Charging Schedule and Infrastructure Plan in due course.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D23//SP14	Countryside Council For Wales			13/05/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.26

Policy: SP14

Summary: SP14 & SP15 meet the test of soundness CE1.

Item Question Representation Text

2 2 Policy Number
SP14 Transport Proposals & SP15 Integrated Transport.

14 14 Representation
We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D24//SP16	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: Clear justification required with transport proposals affecting SSSIs and the Gwent Levels

Item Question Representation Text

2 2 Policy Number
SP16

14 14 Representation

We remind you that section 28G(2) of the Wildlife and Countryside Act 1981 as amended, requires public bodies to take reasonable steps to further the conservation and enhancement of the features for which the site is of special interest. Clear justification will therefore be required with respect of any transport proposals affecting SSSIs within the Gwent Levels, with details of how it is proposed to avoid and mitigate such impacts. If as a last resort it is considered that there is no alternative route for the proposed road schemes and that there is national justification for damage to the SSSIs, compensation measures will be required.

Further, as the Duffryn link Road and M4 relief Road are not in the national or regional transport plans, we query whether they are realistically going to be delivered during the plan period? If not, to meet test of soundness CE2, we recommend that they are deleted from the Plan.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D25//SP16	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: Text required to state that St Brides SSSI will need to be protected during construction.

Item Question Representation Text

2 2 Policy Number

SP16(i)

3 3 Paragraph or section number(s)

2.58

14 14 Representation

SP16(i) Because of the juxtaposition of the Junction 28 Interchange scheme and the St Brides SSSI, we recommend that paragraph 2.58 is amended to clarify that the dock feeder which provides water to St. Brides SSSI will need to be protected during the construction and operational period to protect the water quality entering the SSSI at this location.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D26//SP16	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.27

Site: 429/ Duffryn Link Road

Delete Site

Policy: SP16

Summary: Delete SP16(iii) Western extension of SDR.

Item Question Representation Text

2 2 Policy Number

SP16(iii) Major Road Schemes

3 3 Paragraph or section number(s)

Paragraph 2.60 & 2.61

7 7 A new paragraph or new text.

Yes

14 14 Representation

SP16(iii) CCW has serious concerns in relation to a western extension of the southern distributor road which is located within, and has the potential to have adverse effects on, the Gwent Levels - St Brides SSSI. The road also abuts the boundary of the Gwent Levels Landscape of Outstanding Historic Interest in Wales (LOHIW), where unless designed with great care, similarly has the potential to have adverse effects on the nationally important landscape. We therefore recommend that the road is deleted from the Plan. If it is decided to retain the roadscheme in the Plan, we recommend that paragraphs 2.60 and 2.61 are amended to clarify that development will need to avoid and where that is not possible demonstrate how any adverse impacts on the SSSI and the LOHIW are to be mitigated and or compensated for. (To meet tests of soundness C2 and CE2).

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 & CE2

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D27//SP16	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: Plan should clarify the road will need to avoid potential impacts.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP16(v)	
7	7	A new paragraph or new text.	Yes
14	14	Representation SP16 (v) Given the potential for habitat fragmentation from development at 'SP16(v) – North South Link Llanwern', we recommend that the plan should clarify that the scheme will need to avoid and demonstrate how potential impacts will be mitigated.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
54.D28/2.61/SP16	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27, para.2.61

Policy: SP16

Summary: Text needs to reflect CCW guidance

Item	Question	Representation Text	Soundness Test
2	2	Policy Number SP16	
3	3	Paragraph or section number(s) 2.61	
7	7	A new paragraph or new text.	Yes
14	14	Representation Paragraph 2.61: Whilst we welcome the principle of including provision in the Plan for development proposals to retain bankside habitat either side of Percoed reen, it is not clear on what basis the 5m figure proposed in the Plan has been identified. CCW's guidance Nature Conservation and Physical Development on the Gwent Levels recommends a minimum provision of 7m alongside field ditches, and 12m alongside reens. We would welcome further discussion on this matter, and to meet test of soundness CE2 recommend that the Plan is amended to more accurately reflect the CCW guidance. Further whilst we welcome the reference to otters in Paragraph 2.61, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, ie Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment under Regulation 61, Assessment of implications for European sites. We recommend that the text is amended accordingly. (To meet tests of soundness C2 and CE2.) Finally, in respect of paragraph 2.61, reference should also be made to the St Brides SSSI, of which the Percoed Reen is a part.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2 & CE2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D29//SP17	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.29

Policy: SP17

Summary: Employment Land Requirement is realistic.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP17 - Employment Land Requirements	
7	7	A new paragraph or new text.	Yes
14	14	Representation Given historic take-up levels, we consider that the identified employment land requirement is realistic and therefore meets Test of Soundness CE2. However, it is unclear why paragraph 2.70 refers to a need for 150ha when a requirement of 165ha is identified in the strategic policy. The policy/text should be amended accordingly.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D30//SP18	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.30

Site: 430/ Duffryn

Delete Site

Policy: SP18

Summary: Given over allocation of Employment Land - SP18(i)

Item	Question	Representation Text	Response
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2	2	Policy Number SP18(i)	
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3	3	Paragraph or section number(s) 2.75 & 2.76	
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7	7	A new paragraph or new text.	Yes
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Yes

14	14	Representation	
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Whilst we welcome the information provided in paragraphs 2.75 and 2.76 in relation to the need to consider potential impacts on identified natural heritage interests, we consider that there are a number of discrepancies in the amount of land to be allocated for employment purposes between this policy and EM1. Given the over allocation of land for employment purposes in policy EM1, we advise that sites EM1(i) and EM1(ii) which will result in the direct loss of parts of the Gwent Levels SSSIs are deleted from the plan.

Should this advice be ignored, a number of amendments and points of clarification are required to SP18 and its supporting text.

(i) With regard to the west Newport sites, the Plan should state that development proposals will be required to demonstrate how any potential adverse impacts on the Gwent Level: St. Brides SSSI and the Gwent Levels: Nash & Goldcliff SSSI have been avoided or mitigated.

(ii) Although, we welcome the reference to others in Paragraph 2.76, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, ie Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment under Regulation 61, Assessment of implications for European sites. We recommend that the text is amended accordingly. (To meet tests of soundness C2 and CE2.)

(iii) Paragraph 2.76: Whilst we welcome the principle of including provision in the Plan for development proposals to retain bankside habitat either side of Percoed reen, it is not clear on what basis the 5m figure proposed in the Plan has been identified. CCW's guidance Nature Conservation and Physical Development on the Gwent Levels recommends a minimum provision of 7m alongside field ditches, and 12m alongside reens. We would welcome further discussion on this matter, and to meet test of soundness CE2 recommend that the Plan is amended to more accurately reflect the CCW guidance.

Reference should also be made in 2.76 to the Gwent Levels: St Brides SSSI, of which the Percoed Reen is a part.

15	15	Do you want to speak at Public Examination?	No
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No

Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	No
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No

13	13	Test of Soundness C2 & CE2	
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Item	Question	Response
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Tick-box reply

10	10	Delete an existing site.	Yes
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D31//SP18	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.30

Site: 417/ East of Queensway Meadows

Delete Site

Policy: SP18

Summary: Delete EM1(ii) East of Queensway Meadows Employ Site from LDP.

Item Question Representation Text

2 2 Policy Number

SP18 (ii) - South East Newport within the Eastern Expansion Area.

3 3 Paragraph or section number(s)

2.75 & 2.76

14 14 Representation

Whilst we welcome the information provided in paragraphs 2.75 and 2.76 in relation to the need to consider potential impacts on identified natural heritage interests, we consider that there are a number of discrepancies in the amount of land to be allocated for employment purposes between this policy and EM1. Given the over allocation of land for employment purposes in policy EM1, we advise that sites EM1(i) and EM1(ii) which will result in the direct loss of parts of the Gwent Levels SSSIs are deleted from the plan. Should this advice be ignored, a number of amendments and points of clarification are required to SP18 and its supporting text.

(i) With regard to the west Newport sites, the Plan should state that development proposals will be required to demonstrate how any potential adverse impacts on the Gwent Level: St. Brides SSSI and the Gwent Levels: Nash & Goldcliff SSSI have been avoided or mitigated.

(ii) Although, we welcome the reference to otters in Paragraph 2.76, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, ie Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment under Regulation 61, Assessment of implications for European sites. We recommend that the text is amended accordingly. (To meet tests of soundness C2 and CE2.)

(iii) Paragraph 2.76: Whilst we welcome the principle of including provision in the Plan for development proposals to retain bankside habitat either side of Percoed reen, it is not clear on what basis the 5m figure proposed in the Plan has been identified. CCW's guidance Nature Conservation and Physical Development on the Gwent Levels recommends a minimum provision of 7m alongside field ditches, and 12m alongside reens. We would welcome further discussion on this matter, and to meet test of soundness CE2 recommend that the Plan is amended to more accurately reflect the CCW guidance.

Reference should also be made in 2.76 to the Gwent Levels: St Brides SSSI, of which the Percoed Reen is a part.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 & CE2

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D32//SP19	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.32

Policy: SP19

Summary: Consider Policy meets Test of Soundness C2 & CE1.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number SP19	
14 14	Representation We consider that the policy meets Test of Soundness CE1, and welcome the clarification provided in 2.81 that ecological surveys, mitigation , and management will be required where appropriate.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

54.D33//SP20	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.32

Policy: SP20

Summary: Considers SP20 to meet C2 and CE1 Tests of Soundness

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number SP20 - Assessment of Retail Need.	
14 14	Representation We consider that the policy meets Tests of Soundness C2 and CE1.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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54.D34//SP21	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.33

Policy: SP21

Summary: Considers the policy to meet C2 and CE1 Tests of Soundness

Item Question Representation Text

2 2 Policy Number

SP21 - Waste Management

14 14 Representation

We consider that the policy meets Tests of Soundness C2 and CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D35//SP22	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.34

Policy: SP22

Summary: Consider Policy to meet Test of Soundness C2 and CE1

Item Question Representation Text

2 2 Policy Number

SP22 - Minerals

14 14 Representation

We consider that the policy meets Tests of Soundness C2 and CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D36	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.36

Summary: Welcome reference to the plan should be read as a whole.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number General Policies	
14 14	Representation We welcome the clarification that General Development Principle Policies should be read as a whole.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

54.D37//GP01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.36

Policy: GP01

Summary: Consider the policy to meet Test of Soundness GP1 - Climate Change

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number GP1 - General Development Principles - Climate Change	
14 14	Representation We consider that the policy meets Test of Soundness CE1.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D38//GP02	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.38

Policy: GP02

Summary: Consider Policy GP2 to meet Test of Soundness CE1.

Item Question *Representation Text*

2 2 Policy Number

GP2 - General Development Principles General Amenity

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D39//GP03	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.38

Policy: GP03

Summary: Para 3.14 should be amended to state that proposals need to demonstrate there will be no adverse impact on the Gwent Levels SSSIs.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2 2	Policy Number	GP3 - General Development Principles - Service Infrastructure	
3 3	Paragraph or section number(s)	3.14	
7 7	A new paragraph or new text.		Yes
14 14	Representation	Given that the public sewerage system does not extend to the Gwent Levels, we recommend that paragraph 3.14 for the Plan is amended to state that proposals which include private sewerage treatment facilities in the Gwent Levels will not be permitted unless it can be demonstrated there will be no adverse impact on the quality of the water entering the Gwent Levels SSSI. (To meet test of soundness C2).	
15 15	Do you want to speak at Public Examination?		No
1 1	I think the LDP is sound.		No
13 13	Test of Soundness	C2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D40//GP04	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.39

Policy: GP04

Summary: Policy is considered to meet Test of Soundness CE1.

Item Question *Representation Text*

2 2 Policy Number

GP4 - General Development Principles - Highways and Accessibility

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D41//GP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.40

Policy: GP05

Summary: Redraft Policy to comprehensively cover statutory and non-statutory

Item Question Representation Text

2 2 Policy Number

GP5 - General Development Principles - Natural Environment

14 14 Representation

We welcome the inclusion of a policy and its supporting text which seeks to protect the natural environment and consider it meets test of soundness CE1. However, although the policy identifies the features to be afforded protection, we consider that its comprehension would be helped by redrafting criterion (ii) to read

The proposals demonstrate how they avoid and mitigate negative impacts to biodiversity, ensuring that there are no significant adverse effects on

- statutory and non-statutory designations;

- protected species and their habitats;

-habitats and species of principle importance for biodiversity in Wales; and

- landscape features which support habitat connectivity'.

To ensure that the term statutory and non-statutory designations is understood, we recommend that a definition is provided in the glossary to the Plan.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

CE1

Item Question

Tick-box reply

6 6 A new policy

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
54.D42/3.22/GP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.40, para.3.22

Policy: GP05

Map: Proposals Plan - East

Summary: Proposals and Constraints Maps need to be amended to show biodiversity interests.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number GP5	
3	3	Paragraph or section number(s) 3.22 & 3.23	
4	4	The Proposals Map	Yes
9	9	Amend the boundaries of an existing site.	Yes
14	14	Representation We welcome the clarification on the legislative requirements set out in these paragraphs and the crossreference to TAN 5. We consider that this approach meets Test of Soundness CE1. Paragraph 5.4.6 of Planning Policy Wales (Edition 4, 2011) and 2.24 of Local Development Plans Wales (2005) specifies the need for natural heritage designations (of various types) to be clearly identified on the Plan's Proposals Maps. We note that the archaeological features are identified on the Proposals map and not on the constraints map. As they are also designated nationally and not by the Council, there appears to be an inconsistent approach to mapping features that are to be afforded protection by the Plan and its policies. In line with national policy requirements, to ensure a logical and consistent approach to designations within the Plan and to meet Test of Soundness C2 we therefore recommend that European and national designations are clearly identified on the Proposals Map.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D43//GP05	Countryside Council For Wales			16/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.40

Policy: GP05

Map: Constraints Plan - East

Summary: SSSI line needs to be thicker.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number GP5	
4 4	The Proposals Map	Yes
9 9	Amend the boundaries of an existing site.	Yes
14 14	Representation Notwithstanding the above amendments, there are a number of points of detail regarding the mapping of biodiversity interest currently identified on the Constraints Map that need to be amended: - The boundary line for SSSIs is too fine to be easily viewed, which is likely to result in it being overlooked with consequential risks for the relevant SSSIs. The width of the line should be amended accordingly;	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D44//GP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.40

Policy: GP05

Summary: Plan should show the boundary line between Newport Wetlands SSSI and Gwent Levels SSSI

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number GP5	
4	4	The Proposals Map	Yes
9	9	Amend the boundaries of an existing site.	Yes
14	14	Representation The boundary between the Gwent Levels: Newport Wetlands SSSI and the Gwent Levels: Nash Goldcliff SSSI is not defined on the Map. Given that the notified interests differ between the two sites, we recommend that the boundary is clearly mapped;	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D45//GP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.40

Site: 357/ Newport Wetlands National Nature Reserve

Boundary
Change

Policy: GP05

Summary: Boundary of Newport Wetlands NNR is incorrectly mapped and should be amended.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number GP5	
4 4	The Proposals Map	No
9 9	Amend the boundaries of an existing site.	Yes
14 14	Representation The boundary of Newport Wetlands NNR is incorrectly mapped, and should be amended. We can provide the relevant boundary details if required.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness C2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D46//GP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.40

New Site

Policy: GP05

Summary: Penhow Woodlands NNR should be included on the Map.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number GP5	
4 4	The Proposals Map	Yes
11 11	Site Name Penhow Woodlands NNR	
14 14	Representation Penhow Woodlands NNR should be included on the Map.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
<i>Item Question</i>		<i>Tick-box reply</i>
8 8	Add a new site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D47//GP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.40

Policy: GP05

Summary: Welcome reference to the relevant legislation and national planning policy.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number GP5	
3	3	Paragraph or section number(s) 3.25	
14	14	Representation We welcome the references to the relevant legislation and national planning policy which apply to the protection of protected species, and consider that they meet Tests of Soundness CE1 and C2.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D48//GP05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.40

Policy: GP05

Summary: SINC should be mapped on the Proposals Plan

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number GP5	
3	3	Paragraph or section number(s) 3.27	
4	4	The Proposals Map	Yes
14	14	Representation Whilst we welcome the reference to locally designated sites, it is not clear whether SINC's are mapped under the heading Local Nature Reserve on the constraints map, or not mapped at all. As outlined above national policy advises that natural heritage designations should be mapped on the Proposals Map. We therefore recommend that local designations including SINC's are mapped on the proposals map. (To meet test of soundness C2).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D49//GP06	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.44

Policy: GP06

Summary: Consider the Policy GP6 meets Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number

GP6 - General Development Principles - Quality of Design.

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D50//GP07 Countryside Council For Wales

13/06/2012 E C M

Document:Deposit Plan, p.45

Policy: GP07

Summary: Policy GP7 considered to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number

GP7 - General Development Principles - Environmental Protection and Public Health

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D51//CE01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.47

Policy: CE01

Summary: Delete criterion (vi) from Policy CE1

Item Question Representation Text

2 2 Policy Number

CE1 - Development in the Green Belt

14 14 Representation

Although CCW welcome a policy to protect the openness of the Green Belt and Green Wedges, we do not consider criterion (vi) in each of the policies to be in accord with national policy on green belts and green wedges. PPW clearly states that forms of development other than those listed in paragraph 4.7.16 will be inappropriate unless they maintain the openness of the green belt. Mineral working is not one of the listed uses considered to be appropriate development in a Green Belt/Green Wedges.

Whilst Mineral Planning Policy Wales identifies that mineral extraction is different to other forms of development and can only be extracted where it is found to occur, no extraction or safeguarded areas are identified within the proposed Green Belt or any of the Green Wedges proposed in the LDP. Therefore we do not consider there is any justification to depart from national policy for green belts and green wedges by including mineral development as an acceptable use within them. To meet test of soundness C2 we recommend that criterion (vi) is deleted from both policies.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2

Item Question

6 6 A new policy

Tick-box reply

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D52//CE02	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.47

Policy: CE02

Summary: Delete Criterion (vi) from policy.

Item Question Representation Text

2 2 Policy Number

CE2 - Development in Green Wedge

14 14 Representation

Although CCW welcome a policy to protect the openness of the Green Belt and Green Wedges, we do not consider criterion (vi) in each of the policies to be in accord with national policy on green belts and green wedges. PPW clearly states that forms of development other than those listed in paragraph 4.7.16 will be inappropriate unless they maintain the openness of the green belt. Mineral working is not one of the listed uses considered to be appropriate development in a Green Belt/Green Wedges.

Whilst Mineral Planning Policy Wales identifies that mineral extraction is different to other forms of development and can only be extracted where it is found to occur, no extraction or safeguarded areas are identified within the proposed Green Belt or any of the Green Wedges proposed in the LDP. Therefore we do not consider there is any justification to depart from national policy for green belts and green wedges by including mineral development as an acceptable use within them. To meet test of soundness C2 we recommend that criterion (vi) is deleted from both policies.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
C2

Item Question

6 6 A new policy

Tick-box reply

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D53//CE03	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.48

Policy: CE03

Summary: Welcome requirement to enhance wildlife connectivity.

Item Question Representation Text

2 2 Policy Number

CE3 - Routeways, Corridors and Gateways

14 14 Representation

We welcome the requirement to enhance wildlife connectivity, and consider the policy meets test of soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D54//CE04 Countryside Council For Wales

13/06/2012



E

C

M

Document:Deposit Plan, p.49

Policy: CE04

Summary: Policy considered to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number

CE4 - Waterfront Development

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D55//CE05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.49

Policy: CE05

Summary: Revised policy working required to meet Test of Soundness

Item Question Representation Text

2 2 Policy Number

CE5 Environmental Spaces

14 14 Representation

Although supportive of the principle of the policy CCW have concerns about the wording of criterion (ii) as currently drafted. To meet tests of soundness C2 and CE1 we recommend that criterion (ii) is amended by replacing "No site recognised by the council as having an" with "There is no adverse impact on" at the start of the sentence.

Whilst we recognise that allotments are protected under deposit Plan Policy CF7, they are also a valuable resource for improving health and well being, and supporting habitat connectivity. We therefore suggest that allotments are also identified as 'Environmental spaces' within the Plan.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 and CE1

Item Question

Tick-box reply

6 6 A new policy

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D56//CE08	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.53

Policy: CE08

Summary: Historic Landscapes, Parks, Gardens and Battlefields should be shown on the Proposals Map.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CE8 Historic Landscapes, Parks, Garedens and Battlefields.	
4	4	The Proposals Map	Yes
14	14	Representation Whilst we consider that the policy meets Test of Soundness CE1, we consider that the boundaries of these protected areas should, in line with paragraph 6.4.10 of Planning Policy Wales, be identified on the Proposals Map (to meet Tests of Soundness CE1 and C2).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1 and C2	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D57//CE08	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.53

Policy: CE08

Summary: Clarify that development of more than local scale is required to have an Assessment of the Significance of the Impact of Development on Historic Landscape

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CE8 - Historic Landscapes, Parks, Gardens and Battlefields	
3	3	Paragraph or section number(s) 4.25	
7	7	A new paragraph or new text.	Yes
14	14	Representation We further recommend that the final sentence of paragraph 4.25 is amended to clarify that development which is of such a scale or nature that it is likely to have more than a local impact on the Gwent Levels Historic Landscape, will require an Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL2). Further advice should be sought from Cadw, CCW and the Welsh Archaeological Trusts, preferably at the pre-application stage of the development. (To meet Test of Soundness CE1).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D58/4.37/CE12	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.56, para.4.37

Policy: CE12

Summary: Welcome reference to the Gwent Levels and the recognition that it is a finite resource.

<i>Item Question</i>	<i>Representation Text</i>	
3 3 4.35	Paragraph or section number(s)	
14 14	Representation	
	We welcome the reference to the Gwent Levels and the recognition that it is a finite resource.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D59//CE12	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.56

Policy: CE12

Map: Proposals Plan - East

Summary: Locally designated sites should be shown on the Proposals Plan.

Item Question Representation Text

2 2 Policy Number

CE12 - Locally Designated Nature Conservation and Geological Sites

4 4 The Proposals Map

Yes

14 14 Representation

Although we welcome the policy, we consider that locally designated sites should be mapped on the Proposals Map.

Paragraph 4.42 of the Deposit Plan states that, where appropriate non-statutory sites are identified on the Proposals Map. However, only one site appears to have been mapped, the LNR at Allt-Yr-Yn. To meet test of soundness C2, and provide greater clarity to users of the Plan we recommend that the sites are plotted on the Proposals Map, in line with paragraph 5.4.6 of Planning Policy Wales (Edition 4, 2011) and 2.24 of Local Development Plans Wales (2005).

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

13 13 Test of Soundness

C2

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D60//CE13	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.58

Site: 406/ Developed Coastal Zone

Boundary
Change

Policy: CE13

Map: Proposals Plan - East

Summary: Coastal Zone should go to Newport's administrative boundary.

Item Question Representation Text

2 2 Policy Number
CE13 Coastal Zone

3 3 Paragraph or section number(s)
4.53

9 9 Amend the boundaries of an existing site. Yes

14 14 Representation

As the river Usk's tidal limit is at Newbridge on Usk, beyond Newport's boundary, in line with the Shoreline Management Plan an amendment is required on the proposals map to identify the continuation of the Coastal Zone talong the river Usk to Newport's administrative boundary. .

We welcome the reference to the Shoreline Management Plan review (SMP2) in paragraph 4.53. However, whilst 'Hold the Line' is the policy option for a number of the policy units within the SMP, there is an intention to investigate 'Managed Realignment' for certain policy units (e.g. CALD1, and EN2) during the first epoch of the SMP. Given that such a review is likely to occur during the LDP period, we suggest that this paragraph clarifies that SMP policy options are subject to future investigation.

Please note also that the Severn estuary Flood Risk Management Strategy (SEFRMS) is currently in draft version only.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Neither
Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D61//CE14	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.60

Policy: CE14

Summary: Consider Policy to meet Test of Soundness CE1.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number CE14	
14 14	Representation We consider that the policy meets Test of Soundness CE1.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D62/4.56/CE14	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.60, para.4.56

Policy: CE14

Summary: Supporting text should refer to the potential need for project level HRAs to be undertaken.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CE14 - Renewable Energy	
3	3	Paragraph or section number(s) 4.56	
7	7	A new paragraph or new text.	Yes
14	14	Representation We welcome the recognition of the sensitivity of certain areas to wind turbine development, and welcome the particular reference to the Gwent Levels. However, given that wind energy development have the potential to have significant effects on the Severn Estuary SPA and Ramsar bird features and assemblages, we recommend, as is the case with other policies in the Plan, that the potential need for project level HRA is identified in the supporting text of the policy for proposals near the Severn Estuary. Further, piling works may have an adverse effect on the fish features of the River Usk SAC. We therefore suggest that paragraph 4.56 states that project level HRA will be required for proposals which have the potential to affect the SAC.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D63/4.58/CE14	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.60, para.4.58

Policy: CE14

Summary: Capacity Study should be listed in the list of Background Papers and Technical Background Papers

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
3	3	Paragraph or section number(s) 4.58	
7	7	A new paragraph or new text.	Yes
14	14	Representation We recommend that the capacity study referred to in the text is identified in the authority's list of Background Papers and Technical papers, to demonstrate how proposals for renewable energy will be determined and the policy implemented. (To meet test of soundness CE3).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE3	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D64/4.60/CE14	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.60, para.4.60

Policy: CE14

Summary: Welcome re-use of brownfield sites before greenfield sites.

Item Question *Representation Text*

3 3 Paragraph or section number(s)
4.60

14 14 Representation

Paragraph 4.60

We welcome the proposal to consider and utilise brown field sites before Greenfield sites, and the acknowledgement of their likely proximity to energy users, with the likely reduction in associated infrastructure.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D65/4.62/CE14	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.60, para.4.62

Policy: CE14

Summary: Update to reflect PD rights that apply to householder renewable energy technologies.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CE4	
3	3	Paragraph or section number(s) 4.62	
7	7	A new paragraph or new text.	Yes
14	14	Representation Paragraph 4.62 As the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2012 (CLA152) amends schedule 2 of the 1995 General Permitted Development Order and confers permitted development (PD) rights to householders in respect of certain renewable energy technologies, we recommend that paragraph 4.62 is updated accordingly. We also recommend that consideration and reference in the Plan is given to whether it is appropriate to introduce Article 4 directions removing those PD rights in areas such as SLAs which could be at risk from the cumulative impact of renewable energy technologies.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D66/5.1/H01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62, para.5.1

Policy: H01

Summary: There is no justification for the oversupply of housing included in the Plan.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number H1	
3	3	Paragraph or section number(s) 5.1	
7	7	A new paragraph or new text.	Yes
14	14	Representation H1 Housing Sites & Paragraph 5.1 It is not clear from the text or background paper whether previously committed sites without planning permission have been subject to the SEA process or simply rolled forward into the LDP. Sites being taken forward into the LDP should be subject to the relevant assessment under the SEA process. Clarification is required in the LDP explaining why there is a substantial difference between the housing figures proposed in Policies SP10 and H1. If the Plan identifies the need for 8750 houses (SP10), even with a contingency for failure to deliver some of the sites, there is no apparent justification for the 2775 new units proposed in H1.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D67//H01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Policy: H01

Map: Proposals Plan - East

Summary: Housing allocations boundaries are not clearly shown on the Proposals Plan.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number H1(2); H1(16); H1(52); H1(54); H1(55).	
9	9	Amend the boundaries of an existing site.	
14	14	Representation The boundaries of a number of the allocations are not clearly defined in the Proposals Map. These are H1(2); H1(16); H1(52); H1(54); H1(55). We recommend that the Proposals Map is amended to clearly identify the allocation boundaries and that they are referenced with appropriate shading.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D68//H01.47	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.63

Policy: H01.47

Summary: Plan should state that development at Llanwern will be required to demonstrate mitigation measures on potential impact on Gwent Levels & SSSIs

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number H1(47)	
7	7	A new paragraph or new text.	Yes
14	14	Representation H1 (47) Glan Llyn Former Llanwern CCW are aware that the Llanwern site currently operates a closed system with a dedicated outfall system into the Severn Estuary, which avoids discharge into the Gwent Levels Nash & Goldcliff SSSI. We consider that this provision should be retained as part of any new development at the site. We therefore recommend that the supporting text of the clearly state that proposals for development at the Llanwern allocation will be required to demonstrate how potential adverse impacts on the Gwent Levels: Nash & Goldcliff, Whitson, and Redwick and Llandeenny SSSIs are to be avoided or mitigated, and demonstrate how current mitigation measures at the site will be incorporated into any new development.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
54.D69//H01.56	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.64

Site: 425/ Woodland Site

Delete Site

Policy: H01.56

Summary: Delete Ringland Woodland Housing Site from the Plan

Item Question Representation Text

2 2 Policy Number

H1(56)

7 7 A new paragraph or new text.

Yes

14 14 Representation

H1(56) & H1(57)

CCW has concerns that development at this location is likely to lead to the loss of semi-natural habitats, and reduce habitat connectivity throughout the site into the wider countryside. Given the apparent over provision of allocations to meet the identified housing need during the plan period, we therefore recommend that the sites are deleted from the Plan. (See comments to H1 above).

Should you decide to retain the allocations in the Plan the requirement to retain ecological connectivity through the sites will be a requirement of any future developments at the sites and this should be clearly stated in the Plan. (To meet tests of soundness CE2, CE1 and C2).

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

CE2, CE1 and C2.

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D70//H01.57	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.64

Site: 438/ Hartridge Farm Road

Delete Site

Policy: H01.57

Summary: Delete Hartridge Farm Road Housing Site from the plan as not needed.

Item Question Representation Text

2 2 Policy Number

H1(57)

7 7 A new paragraph or new text.

Yes

14 14 Representation

H1(56) & H1(57)

CCW has concerns that development at this location is likely to lead to the loss of semi-natural habitats, and reduce habitat connectivity throughout the site into the wider countryside. Given the apparent over provision of allocations to meet the identified housing need during the plan period, we therefore recommend that the sites are deleted from the Plan. (See comments to H1 above). Should you decide to retain the allocations in the Plan the requirement to retain ecological connectivity through the sites will be a requirement of any future developments at the sites and this should be clearly stated in the Plan. (To meet tests of soundness CE2, CE1 and C2).

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

CE2, CE1 and C2.

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D71/5.4/H01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.62, para.5.4

Policy: H01

Summary: Welcome reference to the need undertake relevant environmental assessments.

<i>Item Question</i>	<i>Representation Text</i>	
3 3 5.4	Paragraph or section number(s)	
14 14	Representation	
	We welcome the clarification provided in this paragrph.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1 Not Ticked	I think the LDP is sound.	Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D72/5.5/H01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.62, para.5.5

Policy: H01

Summary: St Cadoc's related development will need to have a project level HRA.

<i>Item Question</i>	<i>Representation Text</i>	
3 3	Paragraph or section number(s) 5.5 to 5.7	
7 7	A new paragraph or new text.	Yes
14 14	Representation Paragraphs 5.5 to 5.7: St Cadocs Hospital Site We note that the site is identified as a potential windfall site in the Plan. Given its proximity to the River Usk SAC, we recommend that the Plan also states that development at this site will be subject to a project-level HRA.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound. Not Ticked	Neither

54.D73//H02	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.65

Policy: H02

Summary: Considered to meet Tests of Soundness CE1.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number H2 Housing Standards	
14 14	Representation We consider that the policy meets Test of Soundness CE1.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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54.D74//H05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.66

Policy: H05

Summary: Considered to meet Test of Soundness CE1

Item Question Representation Text

2 2 Policy Number

H5 Affordable Housing Rural Exceptions

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D75//H09	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.68

Policy: H09

Summary: Consider the policy meets Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number

H9 Housing Estate Regeneration.

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D76//H10	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.69

Policy: H10

Summary: Reference to species surveys would improve paragraph.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number H10 - Conversions in the Countryside	
3 3	Paragraph or section number(s) 3.25	
7 7	A new paragraph or new text.	Yes
14 14	Representation H10 Conversions in the Countryside We welcome the reference to protected species within the policy and consider that it meets Tests of Soundness CE1 and C2. Notwithstanding the reference to protected species in criterion (ix) of Policy H10 and in paragraph 3.25, we consider that the supporting text of the policy would be improved with reference to the requirement for species surveys, particularly bats and barn owls, to be submitted with relevant applications. Such a statement would also be applicable to Policies H12 and H13.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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54.D77//H12	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.70

Policy: H12

Summary: Policy considered to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
H12 Replacement Dwellings in the Countryside.

14 14 Representation
We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D78//H13	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.71

Policy: H13

Summary: Considered to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
H13 Extensions to Dwellings in the Countryside

14 14 Representation
We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D79//H15.01 Co	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Policy: H15.01 Coedkernew

Summary: H15(i) Clear justification required for allocation in the Green Wedge.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number H15(j) Coedkernew	
7 7	A new paragraph or new text.	Yes
14 14	Representation Paragraph 33 of WAG Circular 30/2007: Planning for Gypsy and Traveller Caravan Sites states that new Gypsy and Traveller sites are likely to be inappropriate development in green wedges. To meet tests of soundness C2 and CE2 clear justification should therefore be provided to demonstrate that there are no suitable alternative sites outside of the Green Wedge and other designations, before allocating this site in a Green Wedge.	
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness C2 & CE2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D80//H16.03	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: H16(iii) Site should be deleted from plan. Objection to Gypsy and Traveller allocation at Former Army Camp Site, Pye Corner, Nash.

Item Question Representation Text

2 2 Policy Number

H16(iii) Former Army Camp Site, Pye Corner, nash.

14 14 Representation

H16 Gypsy and Traveller Residential Accommodation

H16(iii): Former Army Camp Site, Pye Corner, Nash

The Countryside and Rights of Way Act 2000, places a duty on your authority to take reasonable steps, to further the conservation and enhancement of the features of SSSIs which are of special scientific interest. Development at allocation H16(iii) will result in the direct loss of an area of the Gwent Levels - Nash and Goldcliff SSSI, and has the potential to have adverse impacts on a wider area of the SSSI.

As such, we do not consider that the proposed allocation for gypsy and traveller accommodation at this site will further the conservation and enhancement of the SSSI features, and is therefore contrary to national legislation as translated into planning policy and does not meet Test of Soundness C2. Further, the allocation does not follow on logically from Objective 6 of the Deposit Plan and paragraph 4.37, and is therefore contrary to Test of Soundness CE1. We therefore advise that the allocation is deleted from the Plan.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 & CE1

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D81//H16.02	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.72

Policy: H16.02

Summary: H16(ii) clear justification should be given for the allocation in this location.

Item Question Representation Text

2 2 Policy Number

H16(ii) Former Army Barracks, Pye Corner, Nash

7 7 A new paragraph or new text.

Yes

14 14 Representation

H16(ii) Former Army Barracks, Pye Corner, Nash

The proposed site is adjacent to the Gwent Levels Nash and Goldcliff SSSI. Section 28G of Th Countryside and Rights of Way Act 2000 places a duty on authorities to take reasonable steps to further the conservation and enhancement of the features of SSSIs which are of special scientific interest. The proposal for a site for gypsy and traveller accommodation has the potential for indirect loss and damage to the features of the SSSI over a wide area as water from this site feeds the rest of the SSSI. We recommend that the supporting text to the policy should therefore require proposals to demonstrate how potential adverse impacts on the SSSI have been avoided or mitigated. (To meet Test of Soundness C2)

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D82//H17	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.72

Policy: H17

Summary: Considered to meet test of soundness CE1.

Item Question *Representation Text*

2 2 Policy Number

H17 - Gypsy and traveller Accommodation Proposals

14 14 Representation

We consider that the policy meets Tests of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D83//EM01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.73

Site: 430/ Duffryn

Delete Site

Policy: EM01

Summary: Over provision of employment land - sites with environmental qualities should be deleted as Employment Allocations.

Item Question Representation Text

2 2 Policy Number

EM1 - Employment Land Allocations.

3 3 Paragraph or section number(s)

14 14 Representation

EM1 Employment Land Allocations

It is not clear from the Plan or background papers why Policy EM1 proposes to allocate 290 hectares of land plus 220 hectares of SSSI for employment purposes, when Policy SP17 states that 165 hectares will be required for employment purposes during the Plan period. We consider this discrepancy and the allocation of two SSSIs for employment purposes to be contrary to national policy and tests of soundness CE1, CE2 and C2.

We recommend that the employment allocations EM1(i) and EM1(ii) on the Gwent Levels: St Brides and the Nash and Goldcliff SSSIs are deleted from the plan, and allocations in excess of the requirements set out in Policy SP 17 also be deleted from the Plan.. Detailed comments on the individual allocations are set out as follows:

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

CE1, CE2 and C2

Item Question

Tick-box reply

6 6 A new policy

Yes

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D84//EM01.01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Site: 430/ Duffryn

Delete Site

Policy: EM01.01

Summary: Delete Duffryn Employment allocation

Item Question Representation Text

2 2 Policy Number

EM1(i) - Duffryn

14 14 Representation

Allocation EM 1(i) – Duffryn

Development at this location will lead to the direct loss of a large area of the Gwent Levels - St Brides SSSI, and also has the potential for further loss and damage to its features over a wider area of the SSSI, as water from this area feeds the rest of the SSSI.

As outlined above, the Wildlife and Countryside Act 1981(as amended) places a duty on your authority to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest. The loss of part of the site for employment purposes, particularly when there are other alternatives available, would clearly be contrary to that duty. We recommend that the allocation is deleted from the plan.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

CE1, CE2 and C2

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
54.D85/6.7/EM01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.73, para.6.7

Policy: EM01

Summary: Amended to site requirements of European Legislation

Item	Question	Representation Text	Soundness Test
3	3	Paragraph or section number(s) 6.7 & 6.8	
7	7	A new paragraph or new text.	Yes
14	14	Representation Please see comments to SP18 (ii) and (iii) above. (i)With regard to the west Newport sites, the Plan should state that development proposals will be required to demonstrate how any potential adverse impacts on the Gwent Level: St. Brides SSSI and the Gwent Levels: Nash & Goldcliff SSSI have been avoided or mitigated. (ii)Although, we welcome the reference to otters in Paragraph 2.76, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, ie Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment under Regulation 61, Assessment of implications for European sites. We recommend that the text is amended accordingly. (To meet tests of soundness C2 and CE2.)	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2 and CE2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D86//EM01.02	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.74

Site: 417/ East of Queensway Meadows

Delete Site

Policy: EM01.02

Summary: Delete allocation EM1ii east of Queensway Meadows

Item Question Representation Text

2 2 Policy Number

EM1 (ii) - East of Queensway Meadows

14 14 Representation

Allocation EM1(ii) – East of Queensway Meadows

Development at this location will lead to the direct loss of a large area of the Gwent Levels - Nash and Goldcliff SSSI. This area of the SSSI is the lowest part of the Caldicot Levels from which water feeds into the wider SSSI area, and is one of the few areas where peat is present at the surface. Changes to the hydrological regime at this location, or pollution entering the SSSI at this location, have the potential to have a significant adverse impact on wider areas of the SSSI, and the adjacent Gwent Levels - Whitson SSSI.

As outlined above, the Wildlife and Countryside Act 1981(as amended) places a duty on your authority to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest. The loss of part of the site for employment purposes, particularly when there are other alternatives available, would clearly be contrary to that duty, and we recommend that the allocation is deleted from the plan.

We note that, given the potential direct impact on the SSSI and for other reasons, the Newport City Council Deposit Local Development Plan Sustainability Appraisal Report recommends that this site is not carried forward as part of the preferred development strategy. CCW would welcome clarification from the Council why given the Duty imposed on the Council by Section 28G of the Wildlife and Countryside Act, and the recommendations of the SEA, the site has been allocated for development within the LDP.

We consider that the allocation of the site fails to meet tests of soundness C2, CE1 and CE2.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D87/6.11/EM01.	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.74, para.6.11

Policy: EM01.02

Summary: Relevant Legislation should be referred to.

Item	Question	Representation Text	Soundness Test
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3	3	Paragraph or section number(s) 6.11 & 6.15	
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7	7	A new paragraph or new text.	
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Yes

14	14	Representation	
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Please comments to SP18 (ii) and (iii) above

(ii) Although, we welcome the reference to otters in Paragraph 2.76, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, ie Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment under Regulation 61, Assessment of implications for European sites. We recommend that the text is amended accordingly. (To meet tests of soundness C2 and CE2.)

(iii) Paragraph 2.76: Whilst we welcome the principle of including provision in the Plan for development proposals to retain bankside habitat either side of Percoed reen, it is not clear on what basis the 5m figure proposed in the Plan has been identified. CCW's guidance Nature Conservation and Physical Development on the Gwent Levels recommends a minimum provision of 7m alongside field ditches, and 12m alongside reens. We would welcome further discussion on this matter, and to meet test of soundness CE2 recommend that the Plan is amended to more accurately reflect the CCW guidance.

Reference should also be made in 2.76 to the Gwent Levels: St Brides SSSI, of which the Percoed Reen is a part.

15	15	Do you want to speak at Public Examination?	
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No

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness C2 and CE2.
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
54.D88/6.15/EM01.	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74, para.6.15

Policy: EM01.04

Summary: Relevant Legislation should be referred to.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number EM1(iv) - Solutia	
3	3	Paragraph or section number(s) 6.15 and 6.16	
14	14	Representation Paragraphs 6.15 and 6.16 Whilst we welcome the clarification provided in paragraph 6.14 and 6.15 that proposals will need to be supported by a project-level HRA, there are a number of inaccuracies in them. Therefore please see comments to SP18 (ii) and (iii) above. Additionally to meet test of soundness C2 and ensure there are no adverse impacts on nationally designated sites, the supporting text should also state that proposals will be required to demonstrate how potential adverse impacts on the adjacent Gwent Levels - Nash and Goldcliff SSSI have been avoided or mitigated. (ii) Although, we welcome the reference to otters in Paragraph 2.76, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, ie Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment under Regulation 61, Assessment of implications for European sites. We recommend that the text is amended accordingly. (To meet tests of soundness C2 and CE2.) (iii) Paragraph 2.76: Whilst we welcome the principle of including provision in the Plan for development proposals to retain bankside habitat either side of Percoed reen, it is not clear on what basis the 5m figure proposed in the Plan has been identified. CCW's guidance Nature Conservation and Physical Development on the Gwent Levels recommends a minimum provision of 7m alongside field ditches, and 12m alongside reens. We would welcome further discussion on this matter, and to meet test of soundness CE2 recommend that the Plan is amended to more accurately reflect the CCW guidance. Reference should also be made in 2.76 to the Gwent Levels: St Brides SSSI, of which the Percoed Reen is a part.	
15	15	Do you want to speak at Public Examination?	No

Item	Question	Soundness Test
1	1	I think the LDP is sound.
13	13	Test of Soundness C2, CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D89//EM01.05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.74

Policy: EM01.05

Summary: General mitigation measures will be sought through Policies SP4 and GP5

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2 2	Policy Number	EM1(v) Newport Docks	
14 14	Representation	EM1(v) Newport Docks We acknowledge the lack of detail on these proposals and note the general mitigation will be provided by policies such as SP4 and GP5 and that project level HRA's will be required as detailed proposals come forward.	
15 15	Do you want to speak at Public Examination?		No
1 1	I think the LDP is sound.		Neither
	Not Ticked		

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D90//EM02.03	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.77

Policy: EM02.03

Summary: Plan should state that proposals for development at Llanwern will be required to demonstrate how impacts will be mitigated or avoided.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number EM2(iii) Llanwern Former tipping Area South of Queensway.	
7	7	A new paragraph or new text.	Yes
14	14	Representation EM2 Regeneration Sites EM2(iii) Llanwern Former tipping Area, South of Queensway CCW are aware that the Llanwern site currently operates a closed system with a dedicated outfall system into the Severn Estuary, which avoids discharge into the Gwent Levels Nash & Goldcliff SSSI. We consider that this provision should be retained as part of any new development at the site. We therefore recommend that the supporting text of the policy in paragraph 6.28 clearly state that proposals for development at the Llanwern allocation will be required to demonstrate how potential adverse impacts on the Gwent Levels: Nash & Goldcliff, and Whitson SSSIs are to be avoided or mitigated, and demonstrate how current mitigation measures at the site will be incorporated into any new development. A similar statement regarding the outfall pipe should be included for other sites in the Plan with similar issues.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D91//EM02.12	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.78

Policy: EM02.12

Summary: European Protected Species, sustainable transport and flooding clarification should be provided in the supporting text.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number EM2(xii) Alcan Site	
7 7	A new paragraph or new text.	Yes
14 14	Representation EM2 (xii) Alcan site CCW welcome the intention to develop this site through a Masterplan. Because of likely issues with European Protected species (otters), sustainable transport and flooding (site is C2 floodplain), clarification should be provided in the supporting text to the policy stating how these issues will be addressed. (To meet tests of soundness CE2 and CE3.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness CE2 and CE3.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D92//EM03	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.80

Policy: EM03

Summary: Replace word "sites" with "uses"

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number EM3 - Alternative uses of Employment Land.	
7 7	A new paragraph or new text.	Yes
14 14	Representation We suspect it is a drafting error, but to improve the sense of the policy text we suggest that the first sentence of the policy is amended by replacing "sites" with "uses".	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound. Not Ticked	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D93//T1	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.82

Site: 431/ Coedkernew

Delete Site

Policy: T1

Summary: Delete railway allocation at Coedkernew

Item Question Representation Text

2 2 Policy Number

T1 Railways

14 14 Representation

T1 Railways

The proposed station at Coedkernew is located in the Gwent Levels – St Brides SSSI. As outlined elsewhere in this response the Wildlife and Countryside Act 1981 (as amended) places a duty on your authority to take reasonable steps to further the conservation and enhancement of the features of the SSSIs which are the special scientific interest.

We consider that development at this proposed location will lead to the direct loss of an area of the SSSI, and given the interconnected nature of the drainage system has the potential to adversely affect the features of a wider area of the SSSI. We therefore consider a station at this location to be contrary to national legislation and planning policy and contrary to Test of Soundness C2. We request that the allocation is deleted from the SSSI, and an alternative location representing a greater local need outside any of the Gwent Levels SSSIs be considered.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
54.D94/7.9/T1	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.82, para.7.9

Policy: T1

Summary: Relevant European Legislation should be referenced.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number T1	
3	3	Paragraph or section number(s) 7.9	
7	7	A new paragraph or new text.	Yes
14	14	Representation Paragraph 7.9 Please see comments to SP18 (ii) and (iii) above. We welcome the provision of a new station at Llanwern, which should assist in more sustainable travel patterns for associated residential and employment areas and alleviate traffic congestion in the area. (ii) Although, we welcome the reference to otters in Paragraph 2.76, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, ie Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment under Regulation 61, Assessment of implications for European sites. We recommend that the text is amended accordingly. (To meet tests of soundness C2 and CE2.) (iii) Paragraph 2.76: Whilst we welcome the principle of including provision in the Plan for development proposals to retain bankside habitat either side of Percoed reen, it is not clear on what basis the 5m figure proposed in the Plan has been identified. CCW's guidance Nature Conservation and Physical Development on the Gwent Levels recommends a minimum provision of 7m alongside field ditches, and 12m alongside reens. We would welcome further discussion on this matter, and to meet test of soundness CE2 recommend that the Plan is amended to more accurately reflect the CCW guidance. Reference should also be made in 2.76 to the Gwent Levels: St Brides SSSI, of which the Percoed Reen is a part.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2 and CE2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D95//T2	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.83

Policy: T2

Summary: Consider Policy to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
T2 Heavy Commercial Vehicle Movements

14 14 Representation
We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D96//T5	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.85

Policy: T5

Summary: Consider the policy to meet the test of soundness CE1.

Item Question Representation Text

2 2 Policy Number
T5 Wlaking and Cycling

14 14 Representation
We consider that the policies meet the Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D97//T6	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.85

Policy: T6

Summary: Policy considered to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
T6 Public rights of Way Improvement

14 14 Representation
We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D98//T7	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.86

Policy: T7

Summary: Consider Policy to meet Test of Soundness CE1

Item Question Representation Text

2 2 Policy Number
T7 Public Rights of Way and New Development.

14 14 Representation
We consider that the policies meet the test of soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D99//T8	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.86

Policy: T8

Summary: Consider Policy to meets Test of Soundness CE1.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number T8 All Wales Coast Path	
14 14	Representation We consider that the policies meet Tests of Soundness CE1.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

54.D100//R9	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.95

Policy: R9

Summary: Consider Policy to meet Test of Soundness CE1 and C2.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number R9 Small Scale Retail Proposals	
14 14	Representation We consider that the policies meet Tests of Soundness CE1 and C2.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D101//R11	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.96

Policy: R11

Summary: Policy considered to meet Test of Soundness CE1 and C2.

Item Question Representation Text

2 2 Policy Number
R11 New Out of Centre Retail Sites

14 14 Representation
We consider that the policies meet Tests of Soundness CE1 and C2.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D102//R12	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.97

Policy: R12

Summary: Policy considered to meet Test of Soundness CE1 and C2.

Item Question Representation Text

2 2 Policy Number
R12 Development of Existing Out-of-Centre Retail Sites.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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54.D103//CF01	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.100

Policy: CF01

Summary: Consider Policy to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
CF1 Protection of Playing Fields, Land Used for Sport and Recreation and Areas of Play.

14 14 Representation
We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D104//CF03	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.101

Policy: CF03

Summary: Consider Policy to meet Soundness Test CE1.

Item Question Representation Text

2 2 Policy Number
CF3 Outdoor Play Space Requirements

14 14 Representation
We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D105//CF04	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.102

Policy: CF04

Summary: Consider Policy to meet Soundness Test CE1 and C2.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number CF4 Water Based Recreation	
14 14	Representation We consider that the policies meet Test of Soundness CE1 and C2.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

54.D106//CF05	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.102

Policy: CF05

Summary: Consider Policy to meet Tests of Soundness CE1 and C2.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number CF5 Riverfront Access	
14 14	Representation We consider that the policies meet Tests of Soundness CE1 and C2.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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54.D107//CF06	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.103

Policy: CF06

Summary: Consider policy to meet Tests of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
CF6 Usk and Sirhowy Valley Walks

14 14 Representation
We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D108//CF07	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.103

Policy: CF07

Summary: Consider policy to meet Test of Soundness C2 and CE1.

Item Question Representation Text

2 2 Policy Number
CF7 Allotments

14 14 Representation
We consider that the policy meets Tests of Soundness C2 and CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D109//CF08	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.104

Policy: CF08

Summary: Consider policy to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
CF8 Horse Related Developments

14 14 Representation
We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D110//CF09	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.105

Policy: CF09

Summary: Consider Policy to meet Test of Soundness CE1

Item Question Representation Text

2 2 Policy Number
CF9 Tourism

14 14 Representation
We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D111/9.39/CF1	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.105, para.9.39

Policy: CF10

Summary: Proposals will be required to ensure the Favourable Conservation Status of protected species.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2 2	Policy Number	CF10 Celtic Manor	
3 3	Paragraph or section number(s)	9.39	
7 7	A new paragraph or new text.		Yes
14 14	Representation	CF10 Celtic Manor We are aware that dormice, a European protected species, are present at this location. However, their presence is not recognised in the supporting text of the policy. To ensure the plan provides enough information to adequately inform the future implementation of the policy, we recommend that paragraph 9.39 should clarify that proposals will be required to ensure the Favourable Conservation Status of the species and comply with the Conservation of Habitats and Species Regulations 2010 (as amended). (To meet Tests of Soundness C2 and CE1).	
15 15	Do you want to speak at Public Examination?		No
1 1	I think the LDP is sound.		No
13 13	Test of Soundness	C2 and CE1	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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54.D112//CF11	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.106

Policy: CF11

Summary: Consider policy to meet test of soundness C2 and CE1.

Item Question Representation Text

2 2 Policy Number
CF11 Commercial Leisure Developments.

14 14 Representation
We consider that the policy meets the Test of Soundness CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

54.D113//CF12	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.106

Policy: CF12

Summary: Consider policy to meet soundness test C2 and CE1 - subject to some text changes to para 9.45.

Item Question Representation Text

2 2 Policy Number
CF12 Outdoor Leisure Developments

14 14 Representation
Subject to the amendment to paragraph 9.45 below, we consider that the policy meets tests of soundness C2 and CE1.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D114/9.45/CF1	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.106, para.9.45

Policy: CF12

Summary: Refer to the need to be assessed against relevant LDP and national planning policies.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CF12 Outdoor Leisure Developments	
3	3	Paragraph or section number(s) 9.45	
14	14	Representation Paragraph 9.45 Given that assessment procedures apply to different types of nature conservation designations, we recommend that the third sentence amended by adding 'and will be assessed against relevant LDP and national planning policies' at the end of the sentence. (To meet Tests of Soundness C2 and CE1).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2 and CE1.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D115//CF13	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.108

Policy: CF13

Summary: Consider policy to meet Test of Soundness CE1.

Item Question *Representation Text*

2 2 Policy Number

CF13 Protection of Existing Community Facilities

14 14 Representation

We consider that the policy meets Test of Soundness CE1. However, please see our comments to Policy CF15 in relation to mapping inconsistencies.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D116//CF15	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan Sustainability Appraisal Framework, p.108 Site: 432/ Percoed Lane School Site

Delete Site

Policy: CF15

Summary: Delete South of Percoed Lane site due to environmental designations.

Item Question Representation Text

2 2 Policy Number

CF15(i) South of Percoed Land, Duffryn

14 14 Representation

CF15(i): South of Percoed Lane, Duffryn (mapped as CF13(i) on the Proposals Map)

Development of a school at this location will result in the direct loss of an area of the Gwent Levels St Brides SSSI. Additionally, given the location of this site and the interconnected nature of the drainage system, development of the site also has the potential for detrimental impacts on the SSSI features over a wider area of the SSSI. Such impacts are likely to include the exacerbation of existing water quality concerns affecting this area of the SSSI.

We refer you to our comments above concerning your duties under the Wildlife and Countryside Act 1981 (as amended). We consider that this proposal fails to conserve or enhance the SSSI, and is therefore contrary to national legislation and planning policy and fails to meet Test of Soundness C2. We advise that the site be deleted from the SSSI and located at a more appropriate location within the Plan area.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D117//CF15	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.108

Policy: CF15

Summary: Duffryn High - development will be required to avoid or mitigate potential impacts on the SSSI.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CF15(vi) Duffryn High	
7	7	A new paragraph or new text.	Yes
14	14	Representation CF15(vi): Duffryn High (Mapped as CF13(vi) on the Proposals Map) The site is adjacent to the Gwent Levels St Brides SSSI. To ensure that the proposal has no adverse impacts on the SSSI and meet Tests of soundness C2 and CE1, we recommend that the supporting text to the policy is amended to include a clear statement that development will be required to avoid or mitigate potential impacts on the SSSI.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2 and CE1.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D118//M1	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.110

Policy: M1

Summary: Identification of safeguarded areas does not necessarily indicate an acceptance of working.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number M1 Safeguarding of Mineral Resource	
7	7	A new paragraph or new text.	Yes
14	14	Representation M1 Safeguarding of Mineral Resource For improved clarity, we recommend that the supporting text is amended to state that the identification of safeguarded areas does not necessarily indicate an acceptance of working (To meet Test of Soundness CE1).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D119//M2	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.110

Policy: M2

Summary: Policy considered to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
M2 Mineral Development

14 14 Representation

We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

54.D120//M3	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.111

Policy: M3

Summary: Consider policy to meet Test of Soundness CE1.

Item Question Representation Text

2 2 Policy Number
M3 Oil and Gas

14 14 Representation

We consider that the policies meet Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D1211/W1	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.113

Policy: W1

Summary: Supporting text make reference to need for discharges to avoid entering the SSSI.

Item Question Representation Text

2 2 Policy Number

W1 Waste Site Allocation

7 7 A new paragraph or new text.

Yes

14 14 Representation

W1 Waste Site Allocations

Although we note and welcome the reference for developments to have specific regard to the Gwent Levels - Nash and Goldcliff SSSI, CCW are aware that the Llanwern site currently operates a closed system with a dedicated outfall system into the Severn Estuary, which avoids discharge into the Gwent Levels - Nash & Goldcliff SSSI. We consider that this provision should be maintained as part of any new development at the site. We therefore recommend that the supporting text to the policy is expanded to make specific reference to the need for discharges to avoid entering the SSSI. (To meet tests of soundness C2 and CE3)

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 and CE3

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D122/W2	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.114

Policy: W2

Summary: Consider policy to meet Test of Soundness C2.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number W2 Sites for Waste Management Facilities	
14 14	Representation We consider that the policy meets Test of Soundness C2.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D123/11.9/W3	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.114, para.11.9

Policy: W3

Summary: Add need to refer to requirements of the Plan and other National planning policies are met.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number W3 Waste Management Proposals	
7	7	A new paragraph or new text.	Yes
14	14	Representation W3 Waste Management Proposals Given that the level of protection afforded to sites will differ according to the status of the designation and the biodiversity interest present or affected, we recommend that the penultimate sentence of paragraph 11.9 is amended by adding at its end: “, and relevant requirements set out in Plan and national planning policies are met” (To meet Tests of Soundness CE1 and C2).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1 and C2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D124/IW3	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.114

Policy: W3

Summary: Consider Policy to meet Tests for Soundness CE1.

Item Question *Representation Text*

2 2 Policy Number

W4 Provision for Waste Management Facilities in Development

14 14 Representation

We consider that the policy meets Test of Soundness CE1.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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54.D125//Monitori	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.117

Policy: Monitoring Framework

Summary: Recommend a range of contextual indicators to monitor the environment and statutory designations.

Item	Question	Representation Text	Soundness Test
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2	2	Policy Number Contextual Indicators	
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7	7	A new paragraph or new text.	Yes
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14	14	Representation	
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Monitoring Framework
Contextual Indicators

We welcome the inclusion of contextual indicators as part of the monitoring framework, but have some concerns that there are none relating to the environment, particularly given the acknowledged wealth of environmental interests within the county.

We therefore recommend that the range of contextual indicators should also monitor the condition of statutory designations. Similarly to the contextual indicators proposed in the Plan, this is a contextual indicator which monitors change that can be influenced by factors other than LDP Policy. The appropriate trigger will therefore need to ascertain whether any change is likely to have been brought about by the LDP or other factors.

We further recommend that Newport consider including a specific indicator to monitor water resources as a precautionary measure. Such a measure should primarily relate to monitoring the implementation of the Plan in conjunction with the Environment Agency and Dwr Cymru Welsh Water to ensure that there continues to be adequate water supply throughout the Plan period, with a clear commitment to review the Plan should the monitoring indicate that continued development could lead to unsustainable water resource requirements. (To meet test of soundness CE3).

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness CE3	
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D126//Monitori	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.117

Policy: Monitoring Framework

Summary: Clarification sought on how indicator will trigger a review of the plan policy.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number Core Indicator 2	
7 7	A new paragraph or new text.	Yes
14 14	Representation Core and Local Indicators Objective 1 Sustainable Use of Land Core Indicator 2 To meet test of soundness CE3, clarification is required in the Plan to explain how the recording of 1 permitted development per year is meant to trigger the review of policies delivering this objective. As drafted this has the potential to allow the loss of a significant area of open space over a cumulative number of years without any review of the objective and its policies.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness CE3	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D127//Monitori	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.117

Policy: Monitoring Framework

Summary: Clarification on how indicator will trigger a review of plan policies.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number Objective 4 Housing Core Indicator 7	
7 7	A new paragraph or new text.	Yes
14 14	Representation Objective 4 Housing, Core Indicator 7 Similarly to Objective 1 above, clarification is required about the recording of development for 1 year. If it is only recorded for 1 year, there is the potential for a significant amount of development outside defined settlements over a cumulative number of years without any review of the objective and its policies.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness CE3	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D128//Monitori	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.117

Policy: Monitoring Framework

Summary: Recommend change to trigger point.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number Monitoring Framework Objective 6 Conversion of the Environment (2)	
7	7	A new paragraph or new text.	Yes
14	14	Representation Objective 6 – Conservation of the environment (2) We welcome the inclusion of a monitoring framework for the natural environment. However we recommend that the trigger point for the monitoring of Policy GP1 is amended to: - Net loss of area of SINC habitat or net loss of species population numbers to development.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound. Not Ticked	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D129//Monitori	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.117

Policy: Monitoring Framework

Summary: Clarificaiton sought over trigger point

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number Core Indicator 3	
7 7	A new paragraph or new text.	Yes
14 14	Representation As outlined above clarification is required about the recording of development for a year, as over a cumulative number of years it has the potential to significantly erode the Green Belt.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound. Not Ticked	Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
54.D130//Monitori	Countryside Council For Wales			13/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.0

Policy: Monitoring Framework

Summary: CCW may not always provide advice relating to potential impacts on local designations.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number Core Indicator 4	
7 7	A new paragraph or new text.	Yes
14 14	Representation Core Indicator 4 Due to procedures on consultation responses set out in CCW's 'Operational Procedure Note' we may not always provide advice relating to potential impacts from development on local designations, habitats and species of principle importance for biodiversity in Wales, and landscape features which support habitat connectivity. We therefore advise that the fourth local indicator is amended by inserting "statutory" after "concerning". (To meet Test of Soundness CE3).	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness CE3	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
62.D1//SP08	Leathdunn Ltd	RPS Group PLC		24/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.20

Site: 22/62.J1 Graig-y-Saeson

Boundary
Change

Policy: SP08

Map: Proposals Plan - West

Summary: Remove Graig Y Saeson from the SLA boundary.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Yes</i>
2	2	Policy Number SP8 (vii)	
4	4	The Proposals Map West	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

See attached representations on Policy S8(vii) and the extent of the designation at Tredegar Park as shown on the Proposals Map - West.

The objector seeks an amendment to the SLA to omit the area which has consent for a hotel, tennis centre and golf course at Graig y Saeson.

Introduction

1. This representation is made on behalf of Leathdunn, the owners of land at Graig y Saeson, Newport.

2. An objection is raised to the extent of the land allocated as a Special Landscape Area at Tredegar Park, under the terms of Policy SP8 (vii) and shown on Proposals Map - West.

Background

3. Planning permission has been granted for the development of a hotel, tennis centre and golf course in the form outlined on plan JCC8121:01 attached at Appendix 1. The planning consent remains extant as the work commenced on the site in February 2006 but was discontinued pending the improvement in market conditions. Details of the planning history are attached at Appendix 2.

4. There are no existing SLA's identified within the Newport UDP 1996 -2011, adopted in 2006. The Inspector recommended the omission of the SLA policy. However, the land at Graig y Saeson was not one of the SLA's proposed in the Deposit version of the plan. Therefore the sudden change to designate Graig y Saeson, along with other large tracts of land within the City Council boundaries is surprising.

5. The basis for the designation of the land is in our view unsubstantiated. Figure 4.0/A at the Appendix to Background Document 17 'Designation of Special Landscapes Areas' (June 2009) is very difficult to read but it would appear that the majority of the Graig y Saeson site is classified as 'Moderate' rather than 'High'. While the environs of tredegar House comes out high or outstanding, other areas do not. The Table at page 47 of the same document is also unclear in terms of its rating of Graig y Saeson.

6. In our view, the Graig y Saeson site is radically affected by the elevated section of the M4 which forms its southern boundary and by Forge Lane which is on its eastern edge. The works to be undertaken within the terms of the consent will change the character of the site from the existing and we consider that its assessment as an SLA has not taken this into account. There is nothing in the document which suggests that the planning history of the site has been taken into account and we consider the designation to be unsound.

Conclusion

7. Leathdunn has concerns about the justification for the extent of the SLA's proposed to be designated around Newport but in particular seeks the deletion of the area edged red on plan JCC8121:02 attached at Appendix 3 from the designated SLA at Tredegar Park.

Additional Information Submitted - Available on Request

15 15	Do you want to speak at Public Examination?	Yes
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16 16 Subject to speak on at Examination

The justification for the SLA at Graig y Saeson may need to be debated at the Hearing.

Item Question Soundness Test

1 1	I think the LDP is sound.	No
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13 13 Test of Soundness

CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
76.D1//CF14	Coleg Gwent	RPS Group PLC		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.108

Policy: CF14

Summary: Alternative uses on school sites should also apply to College or University sites.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number CF14	
3	3	Paragraph or section number(s) 9.54	
4	4	The Proposals Map East	Yes
7	7	A new paragraph or new text.	Yes
11	11	Site Name City of Newport Campus (Coleg Gwent) Nash Road, Newport.	
12	12	Site Reference 76.C1	
14	14	Representation Proposed Policy CF14 of the Deposit Plan seeks to protect Existing School Sites for educational purposes unless it can be demonstrated that current provision is surplus to the requirements of the community. There is no corresponding Policy for College or University sites and the Policy CF14 should either be amended to include such sites or, alternatively, an additional policy specific to college and university sites should be added to the Deposit LDP. The representation made on behalf of Coleg Gwent in 2009 at the Candidate Sites stage sought to retain the site's current educational use. However, in view of the then current strategy considerations of the College which were looking at alternative sites elsewhere in the city for a new campus the representations also sought to secure a favourable policy presumption for the alternative use of the site in the event that the College moved off-site during the Plan period. The Alternative Sites sought were "Redevelopment for Mixed Use including Business, Residential, Office and Leisure Uses" and there is still a need to retain that flexibility in the event that during the Plan period funds become available for the relocation of the college facility to another part of the city.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination The principle of amending Policy CF14 as suggested above or adding a new policy specific to the future of College and University sites.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
<i>Item Question</i>			<i>Tick-box reply</i>							
6 6	A new policy									Yes

87.D1//SP03 Caldicot & Wentloog Levels IDB 25/05/2012 E O M

Document: Deposit Plan, p.16

Policy: SP03

Summary: General considerations for proposed development in IDB's operational area.

Item Question Representation Text

14 14 Representation

Thank you very much for the receipt of consultation letter and attached CD in respect of the above Plan.

i) General Comments

Please note that the area of Caldicot & Wentloog Levels is a Natural Flood Plain and whilst every effort will continue to be made to guard against and to alleviate flooding, no guarantee can be given against the worst effects of abnormal weather and tidal conditions

In respect of all new development within IDB's operational area, I would make the following recommendations:

1. A 7 metre strip of land is to be left clear between the top of bank and any building or obstruction, along both banks of any I.D.B. watercourse. This is necessary so that a watercourse can be maintained with heavy machinery.
2. Any works must not compromise the stability of the bank or create a gradient of more than 1:20 towards the watercourse.
3. Provision must be made for the IDB to carry out standard ditch maintenance operations.
4. Absolutely no modification, culverting or in filling of any ditches /reens/ watercourses within IDB district will be undertaken without a written Land

Drainage Consent from the Board.

I would also like to inform you that the Board's requirements in respect of surface water disposal are:

- Rates for storm water runoff discharged from the site to replicate or achieve a reduction from the 'greenfield' response of the site over a range of storm probabilities, accompanied by the required On-site Storage designed for the 1 in 100 year storm event.
- For the range of annual flow rate probabilities, up to and including the 1% annual probability (1 in 100 year storm event) the developed rate of run-off discharged from the site into a Viewed Rhyne or ordinary watercourse shall be no greater than the undeveloped rate of run-off for the same event.
- The potential effect of future climate change shall be taken into account by increasing the rainfall depth by 10% for computing storage volumes.
- All in compliance with The Institute of Hydrology Report 124 (IoH 124)
- Flood estimation for small catchments (1994)
- All to the satisfaction of the Engineer to the Board

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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87.D2//H15.02	Caldicot & Wentloog Levels IDB			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: IDB's consideration for proposed Gypsy and Travellers Transit Site

Item Question Representation Text

14 14 Representation

ii) Proposed Development to Provide Gypsy and Traveller Sites.

The above has been discussed during Full Board Meeting on 21st May 2012 as such on behalf of the Caldicot and Wentloog Levels I would like to reiterate our comments already sent to the Planning Authority in November 2011.

Location within IDB's area

As you know all sites are located directly within Board's operational boundary; and therefore could well adversely affect the IDB operational interests - it could increase the surface water flow in Board's watercourses and place other land and properties at risk of flooding.

I wish to advise that the Sites 1, 2 & 3 are also located within Environment Agency's

Flood Zone which further highlights the high risk of flooding.

Location within or in close proximity to SSSI and associated risks It is noted by the Board that Sites are located right within or just outside Site of Special Scientific Interests – adequate precautions would have to be made to protect invaluable conservation interests – consultation with Countryside Council for Wales is therefore strongly recommended. Members are under the impression that all three sites fall under Newport's 'Green Belt' – could you please clarify that?

Existing Travellers Sites – Board's experience to date The Board has already had dealings with similar sites on the Wentloog Level (within Cardiff City Council's district) and it is my duty to report that increased fly tipping including dumping dead unregistered horses in reens can be observed in these areas. It is an existing issue from environmental and hydrological point of view: Fly tipped material such as tyres and black bags etc. not only can destroy the protected

environment, but also increase the risk of blocked culverts etc. and place land and properties Land Drainage Consent

Please note that the Proposed Works will require written Land Drainage Consent to be obtained from the Board under the terms of the Land Drainage Act 1991 & Flood and Water Management Act 2010 PRIOR TO ANY WORKS ON-SITE. Under these Acts Internal Drainage Boards have a duty to exercise a general supervision over all matters relating to the drainage of land within their Drainage District. In addition to this, the Caldicot and Wentloog Levels Internal Drainage Board (in common with many other Boards) has made Byelaws under Section 66 of the Act, to further control works carried out and activities undertaken by others affecting watercourses within its Drainage District. In particular, the Byelaws permit the Board to control the rate of surface water run-off from development sites into the Drainage District.

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

I hope the above clarifies Board's position.

Thank you very much for consulting with the Caldicot and Wentloog Levels IDB.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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87.D3//H16.02	Caldicot & Wentloog Levels IDB			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: IDB's considerations for the Gypsy and Travellers Sites

Item Question Representation Text

14 14 Representation

ii) Proposed Development to Provide Gypsy and Traveller Sites.

The above has been discussed during Full Board Meeting on 21st May 2012 as such on behalf of the Caldicot and Wentloog Levels I would like to reiterate our comments already sent to the Planning Authority in November 2011.

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Existing Travellers Sites – Board's experience to date The Board has already had dealings with similar sites on the Wentloog Level (within Cardiff City Council's district) and it is my duty to report that increased fly tipping including dumping dead unregistered horses in reens can be observed in these areas. It is an existing issue from environmental and hydrological point of view: Fly tipped material such as tyres and black bags etc. not only can destroy the protected

environment, but also increase the risk of blocked culverts etc. and place land and properties Land Drainage Consent

Please note that the Proposed Works will require written Land Drainage Consent to be obtained from the Board under the terms of the Land Drainage Act 1991 & Flood and Water Management Act 2010 PRIOR TO ANY WORKS ON-SITE. Under these Acts Internal Drainage Boards have a duty to exercise a general supervision over all matters relating to the drainage of land within their Drainage District. In addition to this, the Caldicot and Wentloog Levels Internal Drainage Board (in common with many other Boards) has made Byelaws under Section 66 of the Act, to further control works carried out and activities undertaken by others affecting watercourses within its Drainage District. In particular, the Byelaws permit the Board to control the rate of surface water run-off from development sites into the Drainage District.

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

I hope the above clarifies Board's position.

Thank you very much for consulting with the Caldicot and Wentloog Levels IDB.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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87.D4//H16.03	Caldicot & Wentloog Levels IDB			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objects to proposed Gypsy and Traveller site due to land drainage issues

Item	Question	Representation Text
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14	14	Representation
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ii) Proposed Development to Provide Gypsy and Traveller Sites.

The above has been discussed during Full Board Meeting on 21st May 2012 as such on behalf of the Caldicot and Wentloog Levels I would like to reiterate our comments already sent to the Planning Authority in November 2011.

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

I hope the above clarifies Board's position.

Thank you very much for consulting with the Caldicot and Wentloog Levels IDB.

15	15	Do you want to speak at Public Examination?	Neither
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Not Ticked

Item	Question	Soundness Test
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1	1	I think the LDP is sound.	Neither
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Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D1//SP01	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Support SP1 Sustainability Policy

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Tick-box reply</i>
2	2	Policy Number SP1 Sustainability	
3	3	Paragraph or section number(s) Paragraphs 2.15 - 2.17 inclusive	
14	14	Representation We support the reasoned justification given in paragraphs 2.15 - 2.17 (inclusive) to support Strategic Policy SP1 Sustainability. We support the text, which seeks to make a positive contribution to the local environment and on green infrastructure; developments will be required to pay close attention to use of resources (including water), both in construction and subsequent use; and the production of a Construction Management Plan to demonstrate how the impacts during the construction phase will be minimised and handled.	
15	15	Do you want to speak at Public Examination?	No
10	10	Delete an existing site.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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103.D2//Objective	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.11

Policy: Objective 7

Summary: Support Objective 7

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
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2	2	Policy Number Objective 7	
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3	3	Paragraph or section number(s) Community Facilities and Infrastructure - Objective 7	
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14	14	Representation	
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We support Objective 7 for Community Facilities and Infrastructure, which seeks to ensure the provision of appropriate new, and/or enhanced existing, community facilities, and to safeguard existing ones.

15	15	Do you want to speak at Public Examination?	No
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<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	Yes
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103.D3//GP01	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.36

Policy: GP01

Summary: Support protection of green corridors

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
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2	2	Policy Number GP1	
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14	14	Representation	
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We support and welcome references to the importance of protecting / creating green corridors to link habitat pockets and promote ecological continuity throughout non-designated, especially with regards to areas of aquatic habitats. We support the development of green infrastructure across your Authority area.

15	15	Do you want to speak at Public Examination?	No
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<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D4//GP05	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.40

Policy: GP05

Summary: Support protection of Green Corridors

Item Question Representation Text

2 2 Policy Number
GP5

14 14 Representation

We support and welcome references to the importance of protecting / creating green corridors to link habitat pockets and promote ecological continuity throughout non-designated, especially with regards to areas of aquatic habitats. We support the development of green infrastructure across your Authority area.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

103.D5//CE05	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.49

Policy: CE05

Summary: Support protection of green corridors.

Item Question Representation Text

2 2 Policy Number
CE5

14 14 Representation

We support and welcome references to the importance of protecting / creating green corridors to link habitat pockets and promote ecological continuity throughout non-designated, especially with regards to areas of aquatic habitats. We support the development of green infrastructure across your Authority area.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D6//CE12	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.56

Policy: CE12

Summary: Support protection of green corridors.

Item Question Representation Text

2 2 Policy Number
CE12

14 14 Representation

We support and welcome references to the importance of protecting / creating green corridors to link habitat pockets and promote ecological continuity throughout non-designated, especially with regards to areas of aquatic habitats. We support the development of green infrastructure across your Authority area.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

103.D7//T5	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.85

Policy: T5

Summary: Supports protection of green corridors.

Item Question Representation Text

2 2 Policy Number
T5

14 14 Representation

We support and welcome references to the importance of protecting / creating green corridors to link habitat pockets and promote ecological continuity throughout non-designated, especially with regards to areas of aquatic habitats. We support the development of green infrastructure across your Authority area.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D8/3.6/GP01	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.36, para.3.6

Policy: GP01

Summary: Support Policy GP1 - Climate Change

Item Question *Representation Text*

2 2 Policy Number

GP1 - General Development Principles Climate Change

3 3 Paragraph or section number(s)

Paragraph 3.6

14 14 Representation

We support the reasoned justification given in paragraph 3.6 to support General Policy GP1 General Development Principles - Climate Change, which further sets out the Plans's approach to flood risk in addition to Policy SP3 Flood Risk.

We support the text which will ensure that "development reflects a lifetime appropriate standard of design in line with the most up to date available information".

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D9/3.5/GP01	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.36, para.3.5

Policy: GP01

Summary: Support Policy GP1 Climate Change

Item Question *Representation Text*

2 2 Policy Number

GP1 - General Development Principles

3 3 Paragraph or section number(s)

3.5 and 3.9

14 14 Representation

We support the reasoned justification given in paragraphs 3.5 and 3.9 to support General Policy GP1 General Development Principles - Climate Change, which further sets out the Plan's approach to sustainable management of water. Policy GP1 is in addition to Policy SP4 Water Resources and reasoned justification under paragraph 2.23.

We support the text (paragraph 3.5), which will encourage the use of Sustainable Drainage Systems; allows cross-reference to SP4; (paragraph 3.7) encourages mitigation measures and maintenance as an integral part of development; contributes to innovative design schemes with green roofs and walls as part of a wider SUDs scheme.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D10/3.13/GP0	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.38, para.3.13

Policy: GP03

Summary: Provision of private foul drainage with sewered area is contrary to EA Policy and PPW

Item Question Representation Text

2 2 Policy Number

GP3 General Development Principles - Service Infrastructure

3 3 Paragraph or section number(s)

3.13 and 3.14

14 14 Representation

We support the inclusion of Policy GP3 and reasoned justification contained in paragraphs 3.13 and 3.14. We also advise that 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. 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 of Discharge for private treatment facilities in such circumstances.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D111//Objectiv	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.9

Policy: Objective 2

Summary: Support Objective 2.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number Objective 2	
3	3	Paragraph or section number(s) Climate Change - Objective 2	
14	14	Representation We support Objective 2 on Climate Change, which seeks to ensure that development and land uses in Newport make a positive contribution to minimising, adapting or mitigating against the causes and impacts of climate change, by incorporating the principles of sustainable design, changes to travel behaviour, managing the risks and consequences of flooding, and improving efficiency in the use of energy, waste and water.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D12//Objectiv	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.11

Policy: Objective 6(2)

Summary: Support Objective 6

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number Objective 6 (2)	
3	3	Paragraph or section number(s) Conservation and Environment (2) - Objective 6	
14	14	Representation We support Objective 6 for Conservation and the Environment (2), which seeks to protect and enhance the quality of the natural environment, including protected and non-protected species and habitats, regardless of greenfield or brownfield status, and also including the protection of controlled waters.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
103.D13//SP04	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.17

Policy: SP04

Summary: Recommend "and enhance" is added to the policy wording.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number SP4 Water Resources	
7	7	A new paragraph or new text.	Yes
14	14	Representation Our Environment Agency view is that SP1 Sustainability and SP4 Water Resources are important Strategic Policies, which flows from Objective 2 Climate Change and Objective 6 Conservation and the Environment (2). The former objective seeking the efficient use of water and the latter seeking to protect and enhance the natural environment. Overall we are supportive of Strategic Policies SP1 and SP4 with a focus on water management in terms of water quantity, water quality and increase in surface water run off, we would, however, suggest that text (in bold font) is added to Policy SP4 to read "...DEVELOPMENT PROPOSALS SHOULD REDUCE WATER CONSUMPTION, PROTECT AND ENHANCE WATER QUALITY..." This Policy then links to the reasoned justification given in paragraph 2.23 and 2.24. This is supported by the Water Framework Directive (WFD), which places a duty on public bodies to have regard to River Basin Management Plans (RBMPs) and requires rivers to reach "good" status by 2015. One of the main messages of the WFD is that there should be "no deterioration" of water quality. We also support the inclusion of references made to us, the Environment Agency; review of consents; and the requirement for developers to ensure that there is suitable water supply available without having an adverse impact (given in paragraph 2.24). Furthermore, we support the logical flow to other policies in your Plan, including; •GP1 General Development Principles – Climate Change and reasoned justification given in paragraph 3.8 on the importance of water efficiency in good design and associated benefits in reducing pressure on water resources. •GP3 General Development Principles – Service Infrastructure with a focus on the need for suitable provision of water supply and no unacceptable impact on any existing provision. •GP5 General Development Principles – Natural Environment whereby development will not be approved where mitigation is not possible. We also support text given in Paragraph 3.29 with reference to the Environment Agency and WFD. •GP6 General Development Principles – Quality of Design (vi) where water efficient design principles will be sought in all forms of development.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness Consistency Test C1; Coherence and Effectiveness Tests CE1 and CE2.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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103.D14//Objectiv	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.9

Policy: Objective 1

Summary: Support Objective 1

Item Question Representation Text

3 3 Paragraph or section number(s)
Sustainable Use of Land - Objective 1

14 14 Representation

We support Objective 1 for Sustainable Use of Land, to ensure that all development makes the most efficient use of resources by seeking to locate development in the most sustainable locations, minimises the impact on the environment and makes a positive contribution to local communities.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

103.D15//Objectiv	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.11

Policy: Objective 10

Summary: Support the Waste Objective

Item Question Representation Text

2 2 Policy Number
Objectives

3 3 Paragraph or section number(s)
Waste - Objective 10

14 14 Representation

We support Objective 10 for Waste, which seeks to ensure that waste management choices are based on the proximity principles and a hierarchy of reduce, reuse, recovery and safe disposal, and that there is adequate provision for facilities to enable this to happen.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D16//GP07	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.45

Policy: GP07

Summary: Recommend 'preliminary risk assessment' is added to para 3.42

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number GP7 General Development Principles - Environmental Protection and Public Health	
3	3	Paragraph or section number(s) 3.42	
7	7	A new paragraph or new text.	Yes
14	14	Representation We request text (in bold font) be added to the reasoned justification given in paragraph 3.42 to then state "Subject to relevant statutory provisions, Environmental Impact Assessment, and/or Health Impact Assessment and/or preliminary risk assessment of proposals may be required so that the environmental and health implications of proposed developments can be dully considered before any planning application is determined." 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.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D17/2.20/SP0	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.16, para.2.20

Policy: SP03

Summary: Suggest reference is made to seeking advice from the EA and IDB

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP3 Flood Risk	
3	3	Paragraph or section number(s) Paragrph 2.20	
7	7	A new paragraph or new text.	Yes
14	14	Representation Notwithstanding national guidance (PPW and TAN15), we are supportive of the inclusion of Policy SP3 in your plan. Additionally, whilst we are supportive of the reference to the Environment Agency in the reasoned justification in paragraph 2.20, developers may also wish to seek advice and obtain information from your local authority (drainage engineers) and Internal Drainage Board, where relevant. We suggest additional text is added to the last sentence of paragraph 2.20, "It is recommended that developers seek advice and information from the Environment Agency, Local Authority and Internal Drainage Board where relevant."	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness Test of Soundness Consistency Test C1.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D18/2.20/SP0	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.16, para.2.20

Policy: SP03

Map: Proposals Plan - East

Summary: Insufficient information on the SFCA for a number of housing sites.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number SP3 and cross reference with site allocations		
3	3	Paragraph or section number(s) 2.20 - 2.22		
4	4	The Proposals Map Site allocations		
9	9	Amend the boundaries of an existing site.		Yes
14	14	Representation We refer to our site allocation representations in regard to your Strategic Flood Consequence (SFCA), where we have further advised on suitability testing for some sites on the grounds of insufficient information. In accordance with TAN 15 a proposed allocation should not be made if the consequences of a flooding event cannot be effectively managed. These representations are supported by SP3 and reasoned justification given in paragraph 2.21, which requests the identification of risks and sustainable solutions.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Coherence and Effectiveness Tests CE1 and CE2.		
10	10	Delete an existing site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D19//H15.01 C	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Site: 428/ Pound Hill

[Delete Site](#)

Policy: H15.01 Coedkernew

Summary: Objection to Gypsy and Traveller allocations at Queensway Meadows, Former Army Barracks, Pye Corner and Former Army Campsite, Pye Corner.

Item Question *Representation Text*

2 2 Policy Number

H15(i)

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gypsy and Traveller sites

TAN15 states "caravan, camping and other temporary occupancy sites give rise to special problems in relation to flooding" (paragraph 11.22 of TAN15). We refer you to the remainder of this paragraph in TAN15 for further guidance. These sites would be considered in the highly vulnerable development category from a flood risk perspective (please refer to Section 5.1 of TAN15).

Housing Policy H17 (iii) comments that Gypsy and Traveller Caravan sites will be allowed provided that the site is not within areas at high risk of flooding. The following Gypsy and Traveller sites, however, are located in flood risk areas; H15 (i)- Queensway Meadows

H16 (ii)- Former Army Barracks, Pye Corner

H16 (iii)- Former Army Campsite, Pye Corner

We note that the above sites have been included in the Addendum to the SFCA (reference 47044571, dated January 2012).

The Addendum to the SFCA has highlighted that all of these sites are located within Zone C1 as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms allocations H15 (i) and H16 (iii) to be within the 0.5% (1 in 200 year) and 0.1% (1 in 1000 year) annual probability tidal flood outlines. Allocation H16 (ii) is located partially within the 0.1% (1 in 1000 year) annual probability tidal flood outline. These flood zones are associated with tidal flooding from the Severn Estuary.

The SFCA comments that due to the presence of formal flood defences located adjacent to the Severn Estuary, it is likely that the extent of the flood zones is precautionary and the area is subject to residual risks from breach or overtopping of the defences. We note that no assessment of residual flood risk following breach or overtopping of the flood defences has been made.

We note from comments made in the Addendum to the SFCA (paragraph 2.1.3) that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." It is further stated that "The full effects of climate change would be better assessed following full hydraulic modelling as part of a Stage 3 SFCA or FCA". This modelling would involve simulation of the consequences of a breach or overtopping of the formal flood defences located adjacent to the Severn Estuary. We refer you to our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA. Our view remains that the treatment of flood zones in this way appears to be a reasonable approach and is on the proviso that prior to allocation a more detailed assessment (Stage 3 SFCA) is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware no Stage 3 SFCA nor site specific flood consequence assessment (FCA) has been undertaken. We are unaware of the reason for this omission. Please could you also confirm how the lifetime of development has been considered for this type of development.

Our view is that the SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for these allocations, in accordance with TAN15. It has therefore not been proven that these sites are suitable for inclusion as an allocation within your Plan.

We therefore request that either;

i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question	Soundness Test	
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Soundness Test CE2
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D20//H16.02	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Further work needs to be undertaken on the flooding consequences of the H16(ii) - Former Army Barracks, Pye Corner, Nash

Item Question Representation Text

2 2 Policy Number

H16(ii)

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gypsy and Traveller sites

TAN15 states "caravan, camping and other temporary occupancy sites give rise to special problems in relation to flooding" (paragraph 11.22 of TAN15). We refer you to the remainder of this paragraph in TAN15 for further guidance. These sites would be considered in the highly vulnerable development category from a flood risk perspective (please refer to Section 5.1 of TAN15).

Housing Policy H17 (iii) comments that Gypsy and Traveller Caravan sites will be allowed provided that the site is not within areas at high risk of flooding. The following Gypsy and Traveller sites, however, are located in flood risk areas; H15 (i)- Queensway Meadows

H16 (ii)- Former Army Barracks, Pye Corner

H16 (iii)- Former Army Campsite, Pye Corner

We note that the above sites have been included in the Addendum to the SFCA (reference 47044571, dated January 2012).

The Addendum to the SFCA has highlighted that all of these sites are located within Zone C1 as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms allocations H15 (i) and H16 (iii) to be within the 0.5% (1 in 200 year) and 0.1% (1 in 1000 year) annual probability tidal flood outlines. Allocation H16 (ii) is located partially within the 0.1% (1 in 1000 year) annual probability tidal flood outline. These flood zones are associated with tidal flooding from the Severn Estuary.

The SFCA comments that due to the presence of formal flood defences located adjacent to the Severn Estuary, it is likely that the extent of the flood zones is precautionary and the area is subject to residual risks from breach or overtopping of the defences. We note that no assessment of residual flood risk following breach or overtopping of the flood defences has been made.

We note from comments made in the Addendum to the SFCA (paragraph 2.1.3) that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." It is further stated that "The full effects of climate change would be better assessed following full hydraulic modelling as part of a Stage 3 SFCA or FCA". This modelling would involve simulation of the consequences of a breach or overtopping of the formal flood defences located adjacent to the Severn Estuary. We refer you to our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA. Our view remains that the treatment of flood zones in this way appears to be a reasonable approach and is on the proviso that prior to allocation a more detailed assessment (Stage 3 SFCA) is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware no Stage 3 SFCA nor site specific flood consequence assessment (FCA) has been undertaken. We are unaware of the reason for this omission. Please could you also confirm how the lifetime of development has been considered for this type of development.

Our view is that the SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for these allocations, in accordance with TAN15. It has therefore not been proven that these sites are suitable for inclusion as an allocation within your Plan.

We therefore request that either;

i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question	Soundness Test	
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
		Soundness Test CE2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
10 10	Delete an existing site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D21//H16.03	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

[Delete Site](#)

Policy: H16.03

Summary: Additional work required on the SFCA for the allocation at Former Army Cam Site, Pye Corner, Nash.

Item Question Representation Text

2 2 Policy Number

H16(iii)

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gypsy and Traveller sites

TAN15 states "caravan, camping and other temporary occupancy sites give rise to special problems in relation to flooding" (paragraph 11.22 of TAN15). We refer you to the remainder of this paragraph in TAN15 for further guidance. These sites would be considered in the highly vulnerable development category from a flood risk perspective (please refer to Section 5.1 of TAN15).

Housing Policy H17 (iii) comments that Gypsy and Traveller Caravan sites will be allowed provided that the site is not within areas at high risk of flooding. The following Gypsy and Traveller sites, however, are located in flood risk areas; H15 (i)- Queensway Meadows

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The SFCA comments that due to the presence of formal flood defences located adjacent to the Severn Estuary, it is likely that the extent of the flood zones is precautionary and the area is subject to residual risks from breach or overtopping of the defences. We note that no assessment of residual flood risk following breach or overtopping of the flood defences has been made.

We note from comments made in the Addendum to the SFCA (paragraph 2.1.3) that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." It is further stated that "The full effects of climate change would be better assessed following full hydraulic modelling as part of a Stage 3 SFCA or FCA". This modelling would involve simulation of the consequences of a breach or overtopping of the formal flood defences located adjacent to the Severn Estuary. We refer you to our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA. Our view remains that the treatment of flood zones in this way appears to be a reasonable approach and is on the proviso that prior to allocation a more detailed assessment (Stage 3 SFCA) is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware no Stage 3 SFCA nor site specific flood consequence assessment (FCA) has been undertaken. We are unaware of the reason for this omission. Please could you also confirm how the lifetime of development has been considered for this type of development.

Our view is that the SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for these allocations, in accordance with TAN15. It has therefore not been proven that these sites are suitable for inclusion as an allocation within your Plan.

We therefore request that either;

i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question	Soundness Test	
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Soundness Test CE2
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
10 10	Delete an existing site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D22//H01.01	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 408/ Adj McReadys

[Delete Site](#)

Policy: H01.01

Summary: Further work on flooding needs to be undertaken on the site at Adj Mcready's, Ponthir Road.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		H1.1 Adj. McReadys Pothir Road	
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name	
		H1 - Adj, McReadys Ponthir Road	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),

- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
		Test of Soundness CE2	

Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D23//H01.04	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 418/ Pirelli

[Delete Site](#)

Policy: H01.04

Summary: Housing site needs additional flood work or delete site at Pirelli

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Response</i>
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name H1.4 - Pirelli	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)
H4- Pirelli (Zone C1)
H5- Glebelands (Zone C1)
H6- 254 Cromwell Road (Zone C1)
H7- North of the Villa, Somerton Lane (Zone C1)
H9- Frobisher Road (Zone C1)
H15- Edward Ware, Old Town Dock (Zone C1)
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H20- Former Robert Price (Zone C1)
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H28- Church Street (Zone C2)
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H32- Existing Sainsbury's (partial Zone C1)
H33- Rear of 1-13 Caerleon Road (Zone C1)
H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),
- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

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As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D24//H01.05	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 448/ Glebelands

[Delete Site](#)

Policy: H01.05

Summary: Additional flooding work required or site to be deleted at Glebelands.

Item Question Representation Text

2 2 Policy Number
H1.5 - Glebelands

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

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H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
		Test of Soundness CE2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D25//H01.06	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 419/ 254 Cromwell Road

[Delete Site](#)

Policy: H01.06

Summary: Additional work on SFCA required or delete site at 254 Cromwell Road.

Item Question Representation Text

2 2 Policy Number

H1.6 - 254 Cromwell Road

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

H1.6 - 254 Cromwell Road

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D26//H01.07	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 420/ North of the Villa

Delete Site

Policy: H01.07

Summary: Additional SFCA work required or delete site at North of the Villa, Somerton Road.

Item Question Representation Text

2 2 Policy Number

H1.7 - North of the Villa, Somerton Lane

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),

- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Tst fo Soundness CE2.	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D27//H01.09	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 421/ Frobisher Road

Delete Site

Policy: H01.09

Summary: Additional work required on SFCA or deleted at Frobisher Road.

Item Question Representation Text

2 2 Policy Number

H1.9 - Frobisher Road

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),

- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

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We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
		Test of Soundness CE2	

Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D28//H01.15	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 433/ Edward Ware

[Delete Site](#)

Policy: H01.15

Summary: Additional work required on the SFCA or delete site at Edward Ware, Old Town Dock.

Item Question Representation Text

2 2 Policy Number

H1.15 - Edward Ware, Old Town Dock

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

H1.15 - Edware, Old Town Dock

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

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H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

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15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2.	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D29//H01.16	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 434/ Penmaen Wharf

[Delete Site](#)

Policy: H01.16

Summary: Additional SFCA work required or delete the site at Penmaen Wharf

Item Question Representation Text

2 2 Policy Number

H1.16 - Penmaen Wharf

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

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H1- Adj, McReadys Ponthir Road (partial Zone C2)

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H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D30//H01.18	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 451/ Newport Athletic Club

Delete Site

Policy: H01.18

Summary: Additional SFCA work required or delete site at Newport Athletic Club.

Item Question Representation Text

2 2 Policy Number

H1.18 - Newport Athletic Club

9 9 Amend the boundaries of an existing site.

Yes

12 12 Site Reference

H1.18 - Newport Athletic Club

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),
- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D31//H01.20	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 452/ Former Robert Price

[Delete Site](#)

Policy: H01.20

Summary: Additional SFCA work required or delete site at Former Robert Price.

Item Question Representation Text

- 2 2 Policy Number
H1.20 - Former Robert Price
- 11 11 Site Name
H1.20 - Former Robert Price

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)
H4- Pirelli (Zone C1)
H5- Glebelands (Zone C1)
H6- 254 Cromwell Road (Zone C1)
H7- North of the Villa, Somerton Lane (Zone C1)
H9- Frobisher Road (Zone C1)
H15- Edward Ware, Old Town Dock (Zone C1)
H16- Penmaen Wharf (Zone C2)
H18- Newport Athletic Club (Zone C1)
H20- Former Robert Price (Zone C1)
H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)
H28- Church Street (Zone C2)
H30- The King Hotel (Zone C1)
H31- Roman Lodge Hotel (Zone C1)
H32- Existing Sainsbury's (partial Zone C1)
H33- Rear of 1-13 Caerleon Road (Zone C1)
H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
		Test of Soundness CE2	

Item Question

Tick-box reply

8	8	Add a new site.	Yes
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D32//H01.21	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 453/ Former Floors 2 Go

Delete Site

Policy: H01.21

Summary: Additional SFCA work required or delete site at Former Floors 2 Go

Item Question Representation Text

2 2 Policy Number

H1.21 - Former Floors 2 Go

9 9 Amend the boundaries of an existing site.

Yes

12 12 Site Reference

H1.21 - Former Floors 2 Go

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 housing supply

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H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

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We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2.	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D33//H01.27	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 453/ Former Floors 2 Go

Delete Site

Policy: H01.27

Summary: Additional SFCA work required or delete site at 21 Kelvedon Street.

Item Question Representation Text

2 2 Policy Number

H1.27 - Kelvedon Street.

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 housing supply

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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
		Test of Soundness CE2	

Item Question *Tick-box reply*

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D34//H01.28	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 435/ Church Street

Delete Site

Policy: H01.28

Summary: Additional SFCA work required or delete site Church Street.

Item Question Representation Text

2 2 Policy Number

H1.28 - Church Street

9 9 Amend the boundaries of an existing site.

Yes

12 12 Site Reference

H1.28 - Chruch Street

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),
- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D35//H01.30	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 422/ The King Hotel

[Delete Site](#)

Policy: H01.30

Summary: Additional SFCA work required or delete site at The King Hotel.

Item Question Representation Text

2 2 Policy Number

H1.30 - The King Hotel

9 9 Amend the boundaries of an existing site.

Yes

12 12 Site Reference

H1.30 - The King Hotel

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),

- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D36//H01.31	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 409/ Roman Lodge Hotel

Delete Site

Policy: H01.31

Summary: Additional SFCA work required or delete site at Roman Lodge Hotel.

Item Question Representation Text

2 2 Policy Number

H1.31 - Roman Lodge Hotel

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

H1.31 - Roman Lodge Hotel

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

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- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

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15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D37//H01.32	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 445/ Existing Sainsburys

Delete Site

Policy: H01.32

Summary: Additional SFCA work required or delete the site at the existing Sainsbury's Site.

Item Question Representation Text

2 2 Policy Number

H1.32 - Existing Sainsbury's

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

H1.32 - Existing Sainsbury's

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D38//H01.33	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 449/ Rear of 1-3 Caerleon Road

Delete Site

Policy: H01.33

Summary: Additional SFCA work required or delete site at R/O 1-3 Caerleon Road.

Item Question Representation Text

2 2 Policy Number

H1.33 - Rear of 1-13 Caerleon Road

9 9 Amend the boundaries of an existing site.

Yes

12 12 Site Reference

H1.33 - Rear of 1-13 Caerleon Road

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),
- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D39//H01.34	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.63

Site: 455/ Bankside

[Delete Site](#)

Policy: H01.34

Summary: Additional SFCA work required or delete site at Bankside, Caerack Road.

Item Question Representation Text

2 2 Policy Number

H1.34 - Bankside, Coverack Road

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

H1.34 - Bankside, Coverack Road

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 housing supply

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

H4- Pirelli (Zone C1)

H5- Glebelands (Zone C1)

H6- 254 Cromwell Road (Zone C1)

H7- North of the Villa, Somerton Lane (Zone C1)

H9- Frobisher Road (Zone C1)

H15- Edward Ware, Old Town Dock (Zone C1)

H16- Penmaen Wharf (Zone C2)

H18- Newport Athletic Club (Zone C1)

H20- Former Robert Price (Zone C1)

H21- Former Floors 2 Go (Zone C1)

We also note that the following sites have received planning permission subject to a Section 106 agreement:

H27- 21 Kelvedon Street (Zone C1)

H28- Church Street (Zone C2)

H30- The King Hotel (Zone C1)

H31- Roman Lodge Hotel (Zone C1)

H32- Existing Sainsbury's (partial Zone C1)

H33- Rear of 1-13 Caerleon Road (Zone C1)

H34- Bankside, Coverack Road (Environment Agency Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested for suitability given that there appears to have been a material change in information. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. At our meeting of 23 February 2012, we discussed the objectives and findings from the Environment Agency Wales Study "Newport SFRM Modelling Update of Newport Tidal Model, final report, December 2011. We also wrote to you on 19 March 2012 providing our advice (copy enclosed). The Local Planning Authority (LPA) should be aware that since the above site allocations received planning permission, the Environment Agency holds the best available information in the form of an updated Study (December 2011).

Our Study assesses the risk of the combined sources of flooding, including those areas afforded protection by the 'East Bank' Landform, including any potential 'back door' flooding. Our flood level data also accounts for the uncertainty by incorporating 'confidence limits'. Uncertainty information should be used in order to apply a precautionary approach where there is only one chance to ensure safe development for the future by requesting suitable mitigation. Please note a limitation of our work is that the risk of tidal flooding from the coastline did not form part of our Study. We have previously suggested that this aspect will need to be considered as part of a Strategic Flood Consequence Assessment (SFCA).

In addition, the period over which climate change is considered needs to be specified. This is commonly known as the 'lifetime of development'. In the absence of either a national or local planning authority definition of the lifetime of development, the Environment Agency Wales will recommend that the following timescales are used:

- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),

- All other development types – 75 years (fits within the current PAG).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The LPA currently considers 50 years to be an appropriate factor for lifetime of development (as at 10 December 2010) for development control purposes. As part of the emerging LDP an alternative may be justified and agreed. We recommend the aforementioned timescales. Where shorter timescales are used, however, the LPA should understand and accept that the consequences of flood risk have only been assessed for a limited period and the value used to be reasonable for the type, scale or nature of development proposed.

We note from your SFCA that "in the absence of detailed hydraulic analysis, the anticipated effects of climate change can be considered by treating the Environment Agency Flood Zone 2, as Flood Zone 3, inclusive of climate change." Comments also indicate that the flood extents within some of the site boundaries are similar during both scenarios. In our previous letter of 29 July 2011 (our ref: SE/2008/105263/OR-04/AE1-L01) in response to the draft Stage 1 and 2 SFCA, we provided you with our view that treatment of flood zones in this way appeared to be a reasonable approach. Our view is based on the proviso that prior to allocation a more detailed assessment is to be undertaken on the effects of climate change on flood sources and outputs. As far as we are aware this work has not been undertaken and no reason has been provided to us for this omission. Please confirm how the lifetime of development has been considered.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability), based on the most up to date information. (nb. Relevant information is normally provided from our Area External Relations Team on request (tel. 08708 506506, extwse.cardiff2.WLS@environment-agency.wales.gov.uk)).

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?	Yes
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2	
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Item Question *Tick-box reply*

10	10	Delete an existing site.	
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D40//H01.55	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.64

Site: 446/ Crindau

[Delete Site](#)

Policy: H01.55

Summary: Additional SFCA work required or delete site at Crindau.

Item Question Representation Text

2 2 Policy Number

H1 (55)

11 11 Site Name

Crindau

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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H1 (55) Crindau and EM2 Regeneration site (ix) Crindau for B1, Commercial, Leisure and residential uses;

A site of 11.7ha is proposed for residential development (420units) in your Plan (H1 (55) Housing Site), which is also part of a wider regeneration scheme (refer to policies EM2 ix). Policy EM2 (xi) requires a regeneration scheme to include 10 hectares for B1, commercial, leisure, residential uses.

The residential use renders the development as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). It is further explained in Section 13 Infrastructure Requirements that the timescales for delivery are expected in 2016-2021 with support from the private sector. Although no detailed requirements are identified, your Plan is annotated and explains that flooding is a constraint to development of this allocation and a flood consequence assessment (FCA) would be required.

The allocated site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 year) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Usk, a designated main river.

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012).

Stage 1 and 2 of your SFCA has highlighted flood risk as an issue in this Area (Area 5). Comments made in paragraph 4.6.5 of Stage 2 of the SFCA, identifies that previous assessments and modelling for this area were undertaken circa. 2004. These assessments are now considered to be out of date by us. Your SFCA further recommends that these assessments are reviewed and updated in accordance with current guidance. It is recommended that if the sites at Crindau are progressed through the LDP process, the hydraulic modelling undertaken as part of an FCA is reviewed and updated. The update would include more recently available flow and rainfall data, climate change scenarios and hydraulic modelling software. This may lead to changes in the proposed finished floor levels previously recommended.

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 should be assessed appropriately against up to date environmental criteria and information, not only for risks and consequences of flooding but for a wide range of issues including water availability, suitability of wastewater infrastructure and their impacts. Therefore evidence must be provided to support options (proposals and sites) and also to inform policies being carried forward into a Plan.

Our understanding is that no Stage 3 SFCA or updated FCA at the planning application stage has been produced. For LDP purposes, our view is that an assessment (Stage 3 SFCA) should be undertaken and agreed prior to land being allocated for development to ensure that such land is suitable for inclusion in your Plan. The results of which would enable your Authority to test the site's suitability. The outcomes of a Stage 3 SFCA will identify matters to be investigated as part of a detailed site specific Flood Consequence Assessment (FCA) required at the planning application stage; resulting in informed annotations in your Deposit Plan.

Our view therefore, is that the SFCA has not gone into sufficient detail, using the best available information. We are not currently able to advise you that the risks and consequences of flooding, for housing site reference H1 (55) and regeneration site EMP2 (ix), can be managed to an acceptable level, in accordance with TAN15. Consequently, it has not been proven that this site is suitable for inclusion as an allocation within your Plan.

We also note from Section 13 (Infrastructure Requirements- Leisure) of the Deposit Plan, that there is reference to a pedestrian/cycle link over the River Usk connecting the site to Shaftesbury Park. Your Authority should be aware that a Flood Defence Consent would be required for any proposed works or structures, in, under, over, or within 7 metres of the top of the bank of the River Usk, a designated 'main river'

We recommend that either;

- i) further work should be carried out to enable your Authority to justify this site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed, in line with section 10 of TAN15, or alternatively;
- ii) The allocation should be removed from your Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D41//EM02.09	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.78

Site: 447/ Crindau

[Delete Site](#)

Policy: EM02.09

Summary: Additional SFCA work required or delete site at Crindau.

Item Question Representation Text

2 2 Policy Number

EM2(ix) Regeneration Site - Crindau

11 11 Site Name

EM2(ix) Crindau

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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H1 (55) Crindau and EM2 Regeneration site (ix) Crindau for B1, Commercial, Leisure and residential uses;

A site of 11.7ha is proposed for residential development (420units) in your Plan (H1 (55) Housing Site), which is also part of a wider regeneration scheme (refer to policies EM2 ix). Policy EM2 (xi) requires a regeneration scheme to include 10 hectares for B1, commercial, leisure, residential uses.

The residential use renders the development as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). It is further explained in Section 13 Infrastructure Requirements that the timescales for delivery are expected in 2016-2021 with support from the private sector. Although no detailed requirements are identified, your Plan is annotated and explains that flooding is a constraint to development of this allocation and a flood consequence assessment (FCA) would be required.

The allocated site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 year) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Usk, a designated main river.

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012).

Stage 1 and 2 of your SFCA has highlighted flood risk as an issue in this Area (Area 5). Comments made in paragraph 4.6.5 of Stage 2 of the SFCA, identifies that previous assessments and modelling for this area were undertaken circa. 2004. These assessments are now considered to be out of date by us. Your SFCA further recommends that these assessments are reviewed and updated in accordance with current guidance. It is recommended that if the sites at Crindau are progressed through the LDP process, the hydraulic modelling undertaken as part of an FCA is reviewed and updated. The update would include more recently available flow and rainfall data, climate change scenarios and hydraulic modelling software. This may lead to changes in the proposed finished floor levels previously recommended.

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 should be assessed appropriately against up to date environmental criteria and information, not only for risks and consequences of flooding but for a wide range of issues including water availability, suitability of wastewater infrastructure and their impacts. Therefore evidence must be provided to support options (proposals and sites) and also to inform policies being carried forward into a Plan.

Our understanding is that no Stage 3 SFCA or updated FCA at the planning application stage has been produced. For LDP purposes, our view is that an assessment (Stage 3 SFCA) should be undertaken and agreed prior to land being allocated for development to ensure that such land is suitable for inclusion in your Plan. The results of which would enable your Authority to test the site's suitability. The outcomes of a Stage 3 SFCA will identify matters to be investigated as part of a detailed site specific Flood Consequence Assessment (FCA) required at the planning application stage; resulting in informed annotations in your Deposit Plan.

Our view therefore, is that the SFCA has not gone into sufficient detail, using the best available information. We are not currently able to advise you that the risks and consequences of flooding, for housing site reference H1 (55) and regeneration site EMP2 (ix), can be managed to an acceptable level, in accordance with TAN15. Consequently, it has not been proven that this site is suitable for inclusion as an allocation within your Plan.

We also note from Section 13 (Infrastructure Requirements- Leisure) of the Deposit Plan, that there is reference to a pedestrian/cycle link over the River Usk connecting the site to Shaftesbury Park. Your Authority should be aware that a Flood Defence Consent would be required for any proposed works or structures, in, under, over, or within 7 metres of the top of the bank of the River Usk, a designated 'main river'

We recommend that either;

- i) further work should be carried out to enable your Authority to justify this site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed, in line with section 10 of TAN15, or alternatively;
- ii) The allocation should be removed from your Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<hr/>										
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness									
	Test of Soundness CE2									
<hr/>										
<i>Item Question</i>	<i>Tick-box reply</i>									
10 10	Delete an existing site.		Yes							
<hr/>										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D42//H01.54	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.64

Site: 440/ Former Alcan Site

Delete Site

Policy: H01.54

Summary: Further justification for flood mitigation required or delete the site at Former Alcan Site.

Item Question Representation Text

- 2 2 Policy Number
H1(54), H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements; and SFCA.

- 4 4 The Proposals Map
H1(54) and EM2xii

- 11 11 Site Name
Former Novelis (Alcan) Site

- 12 12 Site Reference
H1(54), H9, EM2xii and CF15 (iii)

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Former Novelis (Alcan) Site H1(54), H9, EM2 xii and CF15 (iii)
Flood Risk and Consequence Matters

A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. The residential and school uses render the development as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector.

The allocation site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 years) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Ebbw, a designated main river.

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012).

Although the SFCA has highlighted flood risk as an issue, it recommends that should the Local Authority wish to allocate a candidate site for development within this area (Area 3), then a more detailed hydraulic modelling will be required as part of a Stage 3 SFCA or site specific FCA to further assess the flood risks and consequences to the site (paragraph 4.4.2 Stage 2 SFCA). We note that a Stage 3 SFCA has not been undertaken. The outputs from a Stage 3 SFCA will need to inform your Plan, which will then subsequently inform future developers in submission of a site specific flood consequence assessment in support of their planning application.

Our view is that your SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for this allocation site, in accordance with TAN15. A Stage 3 assessment has not been undertaken. It has therefore not been proven that this site is suitable for inclusion as an allocation in your Plan.

The main risk is from fluvial flooding from the River Ebbw following a breach of a flood defence that affords some protection to the site. It is our understanding that the defence is privately owned. At present, it is unclear what mitigation options could be implemented, and it has not been demonstrated that the risks and consequences resulting from breach of the defence could be acceptably managed.

We recommend that either

- i) Further work should be carried out to enable your Authority to justify this site allocation, in line with section 10 of TAN15. or,
- ii) The allocation should be deleted from the Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								Yes
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<i>Item Question</i>	<i>Soundness Test</i>									
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1	1	I think the LDP is sound.								No
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13	13	Test of Soundness								
		Test of Soundness CE2.								

<i>Item Question</i>										<i>Tick-box reply</i>
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10	10	Delete an existing site.								Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D43//EM02.12	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.78

Site: 441/ Former Alcan Site

Delete Site

Policy: EM02.12

Summary: Additional flooding justification required or delete the site at Former Alcan Site.

Item Question Representation Text

- 2 2 Policy Number
H1(54), H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements; and SFCA.
- 4 4 The Proposals Map
H1(54) and EM2xii
- 11 11 Site Name
Former Novelis (Alcan) Site

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Former Novelis (Alcan) Site H1(54), H9, EM2 xii and CF15 (iii)
Flood Risk and Consequence Matters

A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. The residential and school uses render the development as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector.

The allocation site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 years) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Ebbw, a designated main river.

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012).

Although the SFCA has highlighted flood risk as an issue, it recommends that should the Local Authority wish to allocate a candidate site for development within this area (Area 3), then a more detailed hydraulic modelling will be required as part of a Stage 3 SFCA or site specific FCA to further assess the flood risks and consequences to the site (paragraph 4.4.2 Stage 2 SFCA). We note that a Stage 3 SFCA has not been undertaken. The outputs from a Stage 3 SFCA will need to inform your Plan, which will then subsequently inform future developers in submission of a site specific flood consequence assessment in support of their planning application.

Our view is that your SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for this allocation site, in accordance with TAN15. A Stage 3 assessment has not been undertaken. It has therefore not been proven that this site is suitable for inclusion as an allocation in your Plan.

The main risk is from fluvial flooding from the River Ebbw following a breach of a flood defence that affords some protection to the site. It is our understanding that the defence is privately owned. At present, it is unclear what mitigation options could be implemented, and it has not been demonstrated that the risks and consequences resulting from breach of the defence could be acceptably managed.

We recommend that either

- i) Further work should be carried out to enable your Authority to justify this site allocation, in line with section 10 of TAN15. or,
- ii) The allocation should be deleted from the Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								Yes
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Test of Soundness CE2.	
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<i>Item</i>	<i>Question</i>	<i>Tick-box reply</i>
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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103.D44//H09	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.68

Site: 443/ Former Alcan Site

Delete Site

Policy: H09

Summary: Further Flooding justification work required or delete the site at Former Alcan site.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
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2	2	Policy Number H9
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4	4	The Proposals Map H1(54) and EM2xii
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11	11	Site Name Former Novelis (Alcan) Site
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12	12	Site Reference H1(54), H9, EM2xii and CF15(iii)
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Former Novelis (Alcan) Site H1(54), H9, EM2 xii and CF15 (iii)
Flood Risk and Consequence Matters

A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. The residential and school uses render the development as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector.

The allocation site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 years) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Ebbw, a designated main river.

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012).

Although the SFCA has highlighted flood risk as an issue, it recommends that should the Local Authority wish to allocate a candidate site for development within this area (Area 3), then a more detailed hydraulic modelling will be required as part of a Stage 3 SFCA or site specific FCA to further assess the flood risks and consequences to the site (paragraph 4.4.2 Stage 2 SFCA). We note that a Stage 3 SFCA has not been undertaken. The outputs from a Stage 3 SFCA will need to inform your Plan, which will then subsequently inform future developers in submission of a site specific flood consequence assessment in support of their planning application.

Our view is that your SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for this allocation site, in accordance with TAN15. A Stage 3 assessment has not been undertaken. It has therefore not been proven that this site is suitable for inclusion as an allocation in your Plan.

The main risk is from fluvial flooding from the River Ebbw following a breach of a flood defence that affords some protection to the site. It is our understanding that the defence is privately owned. At present, it is unclear what mitigation options could be implemented, and it has not been demonstrated that the risks and consequences resulting from breach of the defence could be acceptably managed.

We recommend that either

- i) Further work should be carried out to enable your Authority to justify this site allocation, in line with section 10 of TAN15. or,
- ii) The allocation should be deleted from the Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								
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Yes

<i>Item Question</i>	<i>Soundness Test</i>									
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1	1	I think the LDP is sound.								
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No

13	13	Test of Soundness Test of Soundness CE2.								
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<i>Item Question</i>										
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Tick-box reply

10	10	Delete an existing site.								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D45//CF15	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.108

Site: 439/ Former Alcan School Site

Delete Site

Policy: CF15

Summary: CF15(iii)Former Novelis Site - Further flood mitigation justification required or delete site.

Item Question Representation Text

- 2 2 Policy Number
H1(540, H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements; and SFCA.
- 4 4 The Proposals Map
H1(54) and EM2xii
- 11 11 Site Name
Former Novelis (Alcan) Site
- 12 12 Site Reference
H1(54), H9, EM2xii and CF15(iii)

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Former Novelis (Alcan) Site H1(54), H9, EM2 xii and CF15 (iii)
Flood Risk and Consequence Matters

A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. The residential and school uses render the development as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector.

The allocation site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 years) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Ebbw, a designated main river.

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012).

Although the SFCA has highlighted flood risk as an issue, it recommends that should the Local Authority wish to allocate a candidate site for development within this area (Area 3), then a more detailed hydraulic modelling will be required as part of a Stage 3 SFCA or site specific FCA to further assess the flood risks and consequences to the site (paragraph 4.4.2 Stage 2 SFCA). We note that a Stage 3 SFCA has not been undertaken. The outputs from a Stage 3 SFCA will need to inform your Plan, which will then subsequently inform future developers in submission of a site specific flood consequence assessment in support of their planning application.

Our view is that your SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for this allocation site, in accordance with TAN15. A Stage 3 assessment has not been undertaken. It has therefore not been proven that this site is suitable for inclusion as an allocation in your Plan.

The main risk is from fluvial flooding from the River Ebbw following a breach of a flood defence that affords some protection to the site. It is our understanding that the defence is privately owned. At present, it is unclear what mitigation options could be implemented, and it has not been demonstrated that the risks and consequences resulting from breach of the defence could be acceptably managed.

We recommend that either

- i) Further work should be carried out to enable your Authority to justify this site allocation, in line with section 10 of TAN15. or,
- ii) The allocation should be deleted from the Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								
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Yes

Item	Question	Soundness Test								
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1	1	I think the LDP is sound.								
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No

13	13	Test of Soundness Test of Soundness CE2								
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Item	Question									
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Tick-box reply

10	10	Delete an existing site.								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
103.D46//IR	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.127

Site: 441/ Former Alcan Site

Delete Site

Policy: IR

Summary: Further Flood mitigation justification required or delete site at Former Alcan Site.

Item Question Representation Text

- 2 2 Policy Number
H1(54), H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements; and SFCA.

- 4 4 The Proposals Map
H1(54) and EM2xii

- 11 11 Site Name
Former Novelis (Alcan) Site

- 12 12 Site Reference
H1(54), H9, EM2xii and CF15(iii).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Former Novelis (Alcan) Site H1(54), H9, EM2 xii and CF15 (iii)
Flood Risk and Consequence Matters

A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. The residential and school uses render the development as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector.

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We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012).

Although the SFCA has highlighted flood risk as an issue, it recommends that should the Local Authority wish to allocate a candidate site for development within this area (Area 3), then a more detailed hydraulic modelling will be required as part of a Stage 3 SFCA or site specific FCA to further assess the flood risks and consequences to the site (paragraph 4.4.2 Stage 2 SFCA). We note that a Stage 3 SFCA has not been undertaken. The outputs from a Stage 3 SFCA will need to inform your Plan, which will then subsequently inform future developers in submission of a site specific flood consequence assessment in support of their planning application.

Our view is that your SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level for this allocation site, in accordance with TAN15. A Stage 3 assessment has not been undertaken. It has therefore not been proven that this site is suitable for inclusion as an allocation in your Plan.

The main risk is from fluvial flooding from the River Ebbw following a breach of a flood defence that affords some protection to the site. It is our understanding that the defence is privately owned. At present, it is unclear what mitigation options could be implemented, and it has not been demonstrated that the risks and consequences resulting from breach of the defence could be acceptably managed.

We recommend that either

- i) Further work should be carried out to enable your Authority to justify this site allocation, in line with section 10 of TAN15. or,
- ii) The allocation should be deleted from the Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								
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Yes

Item Question	Soundness Test									
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1	1	I think the LDP is sound.								
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No

13	13	Test of Soundness Test of Soundness CE2.								
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Item Question										
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Tick-box reply

10	10	Delete an existing site.								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
103.D47//H01.54	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.64

Site:

Policy: H01.54

Summary: Support various elements of the plan relating to the redevelopment of the Alcan site.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1(54), H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements.	
4	4	The Proposals Map H1(54) and EM2xii	
11	11	Site Name Former Novelis (Alcan) Site.	
12	12	Site Reference H1(54), H9, EM2xii and CF15(iii)	
14	14	Representation A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector. Your Deposit Plan also identifies that the allocation site, previously an aluminium milling plant (known as Novelis (Alcan)) closed in April 2009 (paragraph 6.37). The allocation site has a previous industrial use and we would also request that suitable studies to be submitted and agreed at the planning application stage, including suitable risk assessments, site investigations and remediation strategies. We therefore support; •Objective 1 Sustainable use of Land, elements of your Spatial Strategy, which seeks to maximise development on previously used, Brownfield sites (paragraph 1.24). •Policies SP1 Sustainability (i, ii, , •Policy GP5 General Development Principles with regard to the Natural Environment. •Policy GP7 General Development Principles with regard to Environmental Protection and Public Health and the reasoned justification given in paragraphs 3.41 and 3.42.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
103.D48//H09	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.68

Policy: H09

Summary: Support various elements of the Plan relating to the allocation of Former allocation of the Former Alcan Site

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1(54), H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements	
4	4	The Proposals Map H1(54) and EM2xii	
11	11	Site Name Former Novelis (Alcan) Site	
12	12	Site Reference H1(54), H9, EM2xii and CF15(iii)	
14	14	Representation A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector. Your Deposit Plan also identifies that the allocation site, previously an aluminium milling plant (known as Novelis (Alcan)) closed in April 2009 (paragraph 6.37). The allocation site has a previous industrial use and we would also request that suitable studies to be submitted and agreed at the planning application stage, including suitable risk assessments, site investigations and remediation strategies. We therefore support; •Objective 1 Sustainable use of Land, elements of your Spatial Strategy, which seeks to maximise development on previously used, Brownfield sites (paragraph 1.24). •Policies SP1 Sustainability (i, ii, , •Policy GP5 General Development Principles with regard to the Natural Environment. •Policy GP7 General Development Principles with regard to Environmental Protection and Public Health and the reasoned justification given in paragraphs 3.41 and 3.42.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
103.D49//EM02.12	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.78

Site:

Policy: EM02.12

Summary: Support various elements of the plan relating to the allocation for the former Alcan Site

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1(54), H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements.	
4	4	The Proposals Map H1(54) and EM2xii	
11	11	Site Name Former Novelis (Alcan) Site	
12	12	Site Reference H1(54), H9, EM2xii and CF15(iii)	
14	14	Representation A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector. Your Deposit Plan also identifies that the allocation site, previously an aluminium milling plant (known as Novelis (Alcan)) closed in April 2009 (paragraph 6.37). The allocation site has a previous industrial use and we would also request that suitable studies to be submitted and agreed at the planning application stage, including suitable risk assessments, site investigations and remediation strategies. We therefore support; •Objective 1 Sustainable use of Land, elements of your Spatial Strategy, which seeks to maximise development on previously used, Brownfield sites (paragraph 1.24). •Policies SP1 Sustainability (i, ii, , •Policy GP5 General Development Principles with regard to the Natural Environment. •Policy GP7 General Development Principles with regard to Environmental Protection and Public Health and the reasoned justification given in paragraphs 3.41 and 3.42.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
103.D50//CF15	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.108

Policy: CF15

Summary: Support various elements of the plan that relate the allocation for the former Alcan site

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1(54), H9, EM2xii, and CF15 (iii); Section 13 Infrastructure Requirements	
4	4	The Proposals Map H1(54) and EM2xii	
11	11	Site Name Former Novelis (Alcan) Site	
12	12	Site Reference H1(54), H9, EM2xii and CF15(iii)	
14	14	Representation A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector. Your Deposit Plan also identifies that the allocation site, previously an aluminium milling plant (known as Novelis (Alcan)) closed in April 2009 (paragraph 6.37). The allocation site has a previous industrial use and we would also request that suitable studies to be submitted and agreed at the planning application stage, including suitable risk assessments, site investigations and remediation strategies. We therefore support; •Objective 1 Sustainable use of Land, elements of your Spatial Strategy, which seeks to maximise development on previously used, Brownfield sites (paragraph 1.24). •Policies SP1 Sustainability (i, ii, , •Policy GP5 General Development Principles with regard to the Natural Environment. •Policy GP7 General Development Principles with regard to Environmental Protection and Public Health and the reasoned justification given in paragraphs 3.41 and 3.42.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
103.D51//IR	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	C		M	

Site:

Policy: IR

Summary: Support various elements of the plan that relate to the allocation of the Former Alcan Site

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1(54), H9, EM2xii and CF15(iii); Section 13 Infrastructure Requirements.	
11	11	Site Name Former Novelis (Alcan) Site	
12	12	Site Reference H1(54), H9, EM2xii and CF15(iii)	
14	14	Representation A site of 40ha is proposed for residential development (700 units) in your Plan (H1 (54) Housing Site and H9 Housing Estate Regeneration), is part of a wider regeneration scheme (refer to policies H9 and EM2 xii). Policy EM2 (xii) requires a regeneration scheme to include 37 hectares for B1, commercial, leisure, residential and community uses. Policy CF15 (iii) also requires the provision of a primary school on site. Under Section 13 Infrastructure Requirements, the timescales for delivery are phased being 2011-2016 and 2016-2021 with support from the private sector. Your Deposit Plan also identifies that the allocation site, previously an aluminium milling plant (known as Novelis (Alcan)) closed in April 2009 (paragraph 6.37). The allocation site has a previous industrial use and we would also request that suitable studies to be submitted and agreed at the planning application stage, including suitable risk assessments, site investigations and remediation strategies. We therefore support; •Objective 1 Sustainable use of Land, elements of your Spatial Strategy, which seeks to maximise development on previously used, Brownfield sites (paragraph 1.24). •Policies SP1 Sustainability (i, ii, , •Policy GP5 General Development Principles with regard to the Natural Environment. •Policy GP7 General Development Principles with regard to Environmental Protection and Public Health and the reasoned justification given in paragraphs 3.41 and 3.42.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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103.D52//H01.50	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	
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Site: 450/ Herbert Road & Enterprise House

Delete Site

Policy: H01.50

Summary: Further flooding work required to justified the allocation or delete the site Herbert Road & Enterprise House.

Item	Question	Representation Text
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2	2	Policy Number H1(50)
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11	11	Site Name Herbert Road and Enterprise House
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12	12	Site Reference H1(50)
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14	14	Representation
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Housing Site H1(50) Herbert Road and Enterprise House

A site of 2.4 ha at Herbert Road and Enterprise House is being allocated for residential development in your Plan. This site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 0.5% (1 in 200 year) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Usk, a designated main river. Comments in Section 13 of your Plan on infrastructure requirements also explain that flooding is a constraint to development and a flood consequence assessment would be required. The proposal is expected to be delivered between 2016-2021 with support from the private sector.

TAN15 (Section 10) is clear, "allocations should only be made in Zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1. The local planning authority "will need to fully explain and justify the reasons for allocating a site within Zone C in the relevant reasoned justification for the allocation".

An allocation should not be made if the consequences of a flooding event, over the lifetime of the development, cannot be effectively managed.

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012). Although the SFCA has highlighted flood risk as an issue, it recommends that should the Local Authority wish to allocate any Candidate Sites for development within this area, then a more detailed Stage 3 assessment will be required. A Stage 3 SFCA has not been undertaken.

Our view is that for housing allocation H1 (50) your SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level, in accordance with TAN15. A Stage 3 assessment has not been undertaken. It has therefore not been proven that this site is suitable for inclusion as an allocation in your Plan.

We recommend that either;

- i) further work should be carried out to enable your Authority to justify this site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) Allocation H1 (50) should be deleted and removed from your Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?
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No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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103.D53//H01.49	Environment Agency Wales			14/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.64

Site: 410/ Mill Street

Delete Site

Policy: H01.49

Summary: Additional flood mitigation justification required or delete the site at Mill Street.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
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2	2	Policy Number
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H1(49)

9	9	Amend the boundaries of an existing site.
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Yes

11	11	Site Name
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Mil Street

12	12	Site Reference
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H1(49)

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Housing allocation H1(49) Mill Street

A housing allocation H1 (49) of 0.4ha is partially located within Zone C2, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be partially within the 0.1% (1 in 1000 year) annual probability fluvial flood outline of the River Lwyd, a designated main river. Section 13 Infrastructure requirements of your deposit plan also explain that flooding is a constraint to development and therefore a flood consequence assessment is required. The proposal is expected to be delivered between 2016-2021 with support from the private sector.

TAN15 (Section 10) is clear, "allocations should only be made in Zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1. The local planning authority "will need to fully explain and justify the reasons for allocating a site within Zone C in the relevant reasoned justification for the allocation". An allocation should not be made if the consequences of a flooding event, over the lifetime of the development, cannot be effectively managed.

It is also recognised in TAN15 (paragraph 11.1) that "Where a site partially falls within Zone C it will be a matter for the planning authority to judge whether to apply Section 6, although it is probable that an assessment in accordance with section 7 and appendix 1 will be required".

We acknowledge the work that has been done by your Authority and your consultants (Scott Wilson and URS) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011) and an Addendum (January 2012). The SFCA has highlighted flood risk as an issue in this area, and that development should be sequentially located within areas classified as low risk. The SFCA states that a Stage 3 SFCA would only be required if sequential location of development is not possible.

Our view is that the SFCA has not gone into sufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level, in accordance with TAN15. A precautionary approach should also be adopted to development within the site, for example, buildings should avoid areas at risk from flooding. It has therefore not been proven that this site is suitable for inclusion as an allocation within your Plan.

We therefore request that either;

- i) further work should be carried out to enable your Authority to justify this site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
- ii) The allocation should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

15	15	Do you want to speak at Public Examination?								Yes
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<i>Item Question</i>	<i>Soundness Test</i>									
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1	1	I think the LDP is sound.								No
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13	13	Test of Soundness								
		Test of Soundness CE2								

<i>Item Question</i>										<i>Tick-box reply</i>
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10	10	Delete an existing site.								Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
117.D1/3.45/CE10	Glamorgan-Gwent Archaeological Trust Ltd				<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.54, para.3.45

Policy: CE10

Summary: Support Policy CE10 (Archaeologically Sensitive Areas)

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2 2	Policy Number	CE10	
3 3	Paragraph or section number(s)	3.45	
14 14	Representation	Support	
15 15	Do you want to speak at Public Examination?		No
1 1	I think the LDP is sound.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D1	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.0

Summary: Overview of the National Grid

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

National Grid has appointed AMEC (formerly Entec) to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document. Overview – National Grid

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

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity. National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

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

Gas Transmission

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

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

Gas Distribution

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

National Grid and Local Development Plan Documents

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

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

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

- any policies relating to overhead transmission lines, underground cables or gas pipeline installations;

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<p>site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines; land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations; any policies relating to the diverting or undergrounding of overhead transmission lines; other policies relating to infrastructure or utility provision; policies relating to development in the countryside; landscape policies; and waste and mineral plans.</p> <p>In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.</p>										
15	15	Do you want to speak at Public Examination?							Neither	
Not Ticked										
<i>Item Question Soundness Test</i>										
1	1	I think the LDP is sound.							Neither	
Not Ticked										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
124.D2//EM01.01	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.73		Site: 391/ Imperial Park		Boundary Change						
Policy: EM01.01										
Summary: Delete area of employment allocation due to location of infrastructure										

Item Question Representation Text

2 2 Policy Number

EM1 (i) Duffryn

14 14 Representation

The Deposit Plan identifies the following allocation which directly affects National Grid assets:

- EM1 (i) Duffryn

Request for changes to the site boundary The allocated site, shown on the proposals map, includes land which forms part of National Grid's Imperial Park substation (see enclosed map). Substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Imperial Park substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Newport and the wider area.

The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future. While National Grid does not object to future development in the area surrounding the substation site, we object to the inclusion of part of the substation site within the allocated site at Duffryn, and request that the boundary for the allocation is redrawn to exclude National Grid's landholding (i.e. to exclude the land within the blue lines on the enclosed map).

15 15 Do you want to speak at Public Examination?

No

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D3//EM01.02	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Policy: EM01.02

Summary: Site crossed by National Grid high voltage transmission lines.

Item Question *Representation Text*

2 2 Policy Number
EM1(ii) East of Queensway Meadows

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
14 14	Representation									
<p>The Deposit Plan proposals map also identifies the following allocations which are crossed by National Grid high voltage transmission lines:</p> <ul style="list-style-type: none"> • EM1 (ii) East of Queensway Meadows • EM1 (iv) Solutia • EM1 (v) Newport Docks • EM2 (iii) Llanwern • W1 Dockway Waste Disposal Site <p>The Deposit Plan identifies two Strategic Highway Schemes (Policy SP16) which are in the vicinity of National Grid high voltage electricity transmission lines as follows:</p> <ul style="list-style-type: none"> • Eastern extension of the southern distributor road along Queensway through the Glan Llyn regeneration and Llanwern steelworks sites. • Western extension of the southern distributor road as the Duffryn link road between Maesglas and Coedkernew. <p>National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.</p> <p>National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.</p> <p>'A Sense of Place' is available from National Grid and can be viewed at: www.nationalgrid.com/uk/senseofplace</p> <p>Further information regarding development near overhead lines and substations is available here: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:</p> <ul style="list-style-type: none"> National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy; specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and A sense of place - design guidelines for development near high voltage overhead lines. 										
15 15	Do you want to speak at Public Examination?									
<p>Not Ticked</p>										

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question *Soundness Test*

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D4//EM01.04	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Policy: EM01.04

Summary: Site is crossed by National Grid high voltage transmission lines.

Item Question *Representation Text*

2 2 Policy Number

EM1(iv) Solutia

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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- EM2 (iii) Llanwern
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15	15	Do you want to speak at Public Examination?								
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Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question *Soundness Test*

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D5//EM01.05	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Policy: EM01.05

Summary: Site is crossed by National Grid high voltage power lines

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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15	15	Do you want to speak at Public Examination?								
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Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.									
	Not Ticked								Neither	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D6//EM02.03	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.77

Policy: EM02.03

Summary: Site is crossed by National Grid high voltage power lines

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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15	15	Do you want to speak at Public Examination?								
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Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question *Soundness Test*

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D7//W1	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.113

Policy: W1

Summary: Docks Way Waste Disposal Site is crossed by high voltage power lines

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
14 14	Representation									
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15 15	Do you want to speak at Public Examination?		Neither							
Not Ticked										

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.									
	Not Ticked								Neither	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D8//SP16	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: SP16(ii) Site is crossed with high voltage power lines.

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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15	15	Do you want to speak at Public Examination?								
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Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question *Soundness Test*

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
124.D9//SP16	The National Grid	AMEC Environment & Infrastructure UK		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: SP16(iii) Site is crossed by high voltage power lines

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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The Deposit Plan proposals map also identifies the following allocations which are crossed by National Grid high voltage transmission lines:

- EM1 (ii) East of Queensway Meadows
- EM1 (iv) Solutia
- EM1 (v) Newport Docks
- EM2 (iii) Llanwern
- W1 Dockway Waste Disposal Site

The Deposit Plan identifies two Strategic Highway Schemes (Policy SP16) which are in the vicinity of National Grid high voltage electricity transmission lines as follows:

- Eastern extension of the southern distributor road along Queensway through the Glan Llyn regeneration and Llanwern steelworks sites.
- Western extension of the southern distributor road as the Duffryn link road between Maesglas and Coedkernew.

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

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

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

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

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

Further information regarding development near overhead lines and substations is available here: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm

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

National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy; specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and

A sense of place - design guidelines for development near high voltage overhead lines.

15	15	Do you want to speak at Public Examination?								
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Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

1 1 I think the LDP is sound.
Not Ticked

Neither

126.D1/0.9/Overvi Gwent Wildlife Trust

28/05/2012 E C M

Document:Deposit Plan, p.1, para.0.9

Policy: Overview

Summary: Support the protection of green spaces.

Item Question Representation Text

3 3 Paragraph or section number(s)
0.9; 0.15; 0.16

14 14 Representation

Gwent Wildlife Trust supports the protection of green spaces and the countryside, and the recognition of their multifunctional nature and provision of ecosystem services, especially their value to the local economy. As the Welsh Government intends to use ecosystem health as its guiding principle for protection and management of the environment, it is important that local authorities are aware of the ways that ecosystems function and provide valuable services within their area.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D2/0.3/Overvi	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.1, para.0.3

Policy: Overview

Summary: Clarification required that not all brownfield sites are suitable for redevelopment.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
3	3	Paragraph or section number(s) 0.3; 0.10; 0.13	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust generally welcomes the re-use of brownfield sites, because they often have very little biodiversity value, and often occupy more sustainable locations. However, some of Newport's brownfield sites should be excluded from this general strategy on account of their ecological value. Open Mosaic Habitats on Previously Developed Land (OMH) are UKBAP and S42 Priority Habitats, and are excluded from the definition of brownfield land in Planning Policy Wales (2011) (Ch4). We therefore recommend the following change to the text in paragraph 0.3 for increased clarity. A sustainable development strategy is proposed, with a focus on regeneration, building on the culture and heritage of the city, seeking to maximise the use of previously developed, brownfield land (as defined by Planning Policy Wales).	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
		<i>Item Question</i>	<i>Soundness Test</i>
1	1	I think the LDP is sound.	No
13	13	Test of Soundness This section fails to meet C2 - it does not comply with national policy.	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D3/0.18/Overv	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.1, para.0.18

Policy: Overview

Summary: Object to the inclusion of a train station at Coedkernew.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
3	3	Paragraph or section number(s) 0.18	
7	7	A new paragraph or new text.	Yes
14	14	Representation Whilst Gwent Wildlife Trust generally supports measures to improve public transport, we object to the inclusion of a railway station at Coedcernew. We also have serious concerns relating to the proposed highway schemes. Please see our comments relating to SP16 and T1.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D4/1.7/Overvi	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.1, para.1.7

Policy: Overview

Summary: Support plan but seek clarification on heritage and biodiversity.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
3	3	Paragraph or section number(s) 1.7; 1.8	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust supports the inclusion of nature conservation and biodiversity within the identified issues for the LDP, but suggests the following changes for increased clarity: Newport has a rich natural and historic heritage resource which needs to be conserved, used and promoted. This change would encompass the whole of Newport's heritage, and reflects objectives and policies that occur later within the document. Biodiversity is declining nationally due to a number of factors. Newport has particularly valuable resources, with a rich diversity of habitats of local, national and international importance; the LDP can contribute to reversing biodiversity decline through protecting and enhancing existing resources and creating new habitats. PPW (2011) states that: 'The planning system has an important part to play in meeting biodiversity objectives by promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Local planning authorities must address biodiversity issues, insofar as they relate to land use planning, in both development plans and development control decisions.' The suggested change identifies the issue (biodiversity loss) more clearly, and demonstrates how the LDP can contribute positively to addressing the issue, reflecting national policy.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D5/1.11-1.13/	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.1, para.1.11-1.13

Policy: Overview

Summary: Networked Environment Region should be referred to in the plan.

Item Question Representation Text

3 3 Paragraph or section number(s)
1.11 - 1.13

7 7 A new paragraph or new text.

Yes

14 14 Representation

The concept of a Networked Environment Region is a key feature of the Wales Spatial Plan for the South East Region. This concept involves increasing ecological connectivity and improving access to wildlife and the countryside, both of which feature in the LDP. As the Gwent Levels has been identified as a case study within the Framework for the Networked Environment Region (Welsh Government, CCW, EAW and WEL, 2009), we object to its exclusion from the LDP.

Suggested addition: The Wales Spatial Plan introduces the concept of the South East Region as a Networked Environment Region. This aims to increase ecological connectivity and promote access to wildlife and the countryside.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

This section fails to meet C3 - it does not have regard to the Wales Spatial Plan.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D6/1.23 - 1.28/	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.1, para.1.23 - 1.28

Policy: Overview

Summary: Development should be focused on appropriate brownfield sites - not all brownfields are suitable for developments.

Item Question Representation Text

3 3 Paragraph or section number(s)
1.23 - 1.28

7 7 A new paragraph or new text.

Yes

14 14 Representation

Whilst we support Objectives 1 and 2, we feel they require further explanation and clarification. 'Sustainable locations' does not just refer to the reuse of land; PPW Section 4.6 (2011) lists many other considerations such as proximity to sustainable modes of transport and infrastructure, and climate change resilience. Many of these issues are mentioned in the text accompanying Objective 2, but in a context of design rather than location of development. It should be made clear that the LDP can significantly contribute to sustainable development through both location and design of new development. Please also see our comments relating to the ecological value of some brownfield land (0.3; 0.10; 0.13).

A key way in which the plan will seek to meet this objective is by focusing development on appropriate, previously used, brownfield sites. Newport has a good supply of this type of land. Some of the sites are of a sufficient size that they have the potential to create new communities in their own right, with a mix of different land uses, and with appropriate landscaping making for a pleasant environment.

The LDP will contribute to sustainable development by locating development on sites in close proximity to existing infrastructure and transport nodes.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

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

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D7/1.33/Objec	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.11, para.1.33

Policy: Objective 6(2)

Summary: Support Objective 6

Item Question Representation Text

3 3 Paragraph or section number(s)

Objective 6; 1.33

14 14 Representation

Gwent Wildlife Trust strongly supports Objective 6, particularly its inclusiveness. This is in keeping with the Council's duty to have regard for biodiversity under the NERC Act (2006), and PPW Ch5 (2011) which states that development plans should 'provide for the conservation and, where appropriate, enhancement of biodiversity and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity'.

Gwent Wildlife Trust also supports the prioritisation of biodiversity protection and enhancement over brownfield status. As TAN 5 (2009) states that 'Where development proposals may affect national or local BAP habitats or species the same principles apply as to locally designated sites' this will allow the protection of sites qualifying as Open Mosaic Habitats on Previously Developed Land (OMH).

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D8//Objective	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.11

Policy: Objective 9

Summary: Support the recognition of the contribution that biodiversity and access to natural spaces can make to people's health and wellbeing.

Item Question Representation Text

3 3 Paragraph or section number(s)
Objective 9; 1.36

14 14 Representation

Gwent Wildlife Trust supports the recognition of the contribution that biodiversity and access to natural spaces can make to people's health and wellbeing. We especially welcome the background paper on Environmental Spaces and the Council's Accessible Natural Greenspace assessment.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D9//SP01	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.14

Policy: SP01

Summary: Seek the inclusion of 'green infrastructure' in the policy wording.

Item Question Representation Text

2 2 Policy Number
SP1

14 14 Representation

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

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Item Question

Tick-box reply

6 6 A new policy

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D10//SP04	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.17

Policy: SP04

Summary: Support the conservation of water resources and use of sustainable urban drainage systems.

Item Question Representation Text

2 2 Policy Number
SP4

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust is deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the council's own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
126.D111//SP09	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Policy: SP09

Summary: Make reference to that all biodiversity provides valuable ecosystem services.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number SP9	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust strongly supports the protection, management and enhancement of the natural environment. We welcome the desire to improve and restore biodiversity. It should be noted that the county's 'important environmental resources' are not restricted to designated sites. We support the acknowledgement that the council has a duty to protect those sites and species of national and international importance; however all biodiversity in Newport is providing valuable ecosystem services, such as pollution and flood alleviation, and contributing to the health and wellbeing of the local population. It is the whole range of wildlife that provides Newport's unique setting and supports many aspects of the local economy. As the Welsh Government aims to use ecosystem function as a guiding principle for the protection and management of the environment, it is appropriate to make reference to this here. We therefore recommend the following addition: All biodiversity provides valuable ecosystem services that are vital to the health and wellbeing of local people, and contribute significantly to the local economy.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D12//SP12	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.24

Policy: SP12

Summary: Supports the protection of allotments and community gardens.

Item Question Representation Text

2 2 Policy Number
SP12

14 14 Representation

Gwent Wildlife Trust supports the protection of allotments and community gardens, because these can be valuable for wildlife, and also help people connect with natural environment.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D13//SP14	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.26

Policy: SP14

Summary: Supports the inclusion of biodiversity enhancement within transport proposals.

Item Question Representation Text

2 2 Policy Number

SP14

14 14 Representation

Gwent Wildlife Trust supports the inclusion of biodiversity enhancement within transport proposals. Existing verges and embankments can form important wildlife corridors, and new transport routes create opportunities to extend this network. PPW Ch5 (2011) identifies linear features or wildlife corridors as an important part of the Natura 2000 network, and states that development plans should encourage their appropriate management.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D14//SP16	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27

Site: 429/ Duffryn Link Road

Delete Site

Policy: SP16

Summary: Objects to the inclusion of major road schemes

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP16	
7	7	A new paragraph or new text.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gwent Wildlife Trust objects to the inclusion of major road schemes, and assumptions and omissions within the accompanying text.

The upgrading of the Queensway has the potential to impact on the Whitson, Nash and Goldcliff SSSIs, because the reens directly adjacent to the road flow through the SSSI. Although the scheme is being undertaken by Welsh Government, it needs to be acknowledged that there are potential impacts, and that these will be addressed. TAN 5 (2009) states that 'Local planning authorities, along with other public bodies, have a duty to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which SSSIs are of special scientific interest'. The LDP could draw attention to the opportunities associated with the development of the Queensway and Glan Llyn to enhance the SSSI as well as protect it.

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

Should there be no feasible alternative to the route, proposed, a developer will have many environmental issues to consider, namely:

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

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

TAN 5 (2009) states that 'Where relevant, local development plans should include policies that:

- Draw attention to the legal procedures that would apply to developments likely to have a significant effect on an internationally designated site and refer to the sites shown on the proposals map;
- Safeguard nationally and locally designated sites whilst making clear the relative weight to be attached to the different designations;

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

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item	Question	Soundness Test	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1	1	I think the LDP is sound.								No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness									
This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP(CE1).										
	<i>Item Question</i>								<i>Tick-box reply</i>	
6 6	A new policy								Yes	
10 10	Delete an existing site.									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
126.D15//SP18	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.30

Policy: SP18

Summary: Objects to allocations in SSSIs and SINCs

Item	Question	Representation Text	Soundness Test
2	2	Policy Number SP18	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes
14	14	Representation Gwent Wildlife Trust objects to allocations on SSSIs and SINCs. These sites have been allocated for their nature conservation interest, so it is not compliant with national policy or other LDP policies to allocate them for development. Allocations should be amended to exclude SSSIs and SINCs. Please see our detailed comments relating to EM1. PPW Ch5 (2011) states that 'the Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI.' TAN 5 2009 states that development plans should: • Safeguard nationally and locally designated sites whilst making clear the relative weight to be attached to the different designations; • Encourage the conservation and management of features of the landscape of major importance for wild flora and fauna; • Give local expression to the protection, and where possible enhancement, of species and their habitats, especially those with legal protection and those of principal importance for biodiversity conservation in Wales'	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).	

Item Question

Tick-box reply

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6 6	A new policy		Yes							
10 10	Delete an existing site.		Yes							

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
126.D16//GP01	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.36

Policy: GP01

Summary: Developments should be designed where possible to include new green infrastructure or complement existing green infrastructure

Item	Question	Representation Text	Yes
2	2	Policy Number GP1	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust supports measures to reduce greenhouse gas emissions and address the impacts of climate change, and welcomes the inclusion of green infrastructure within the supporting text. Green infrastructure, as mentioned, can have a wide range of benefits, and can also help wildlife adapt to climate change. However, green infrastructure is not limited to green/brown roofs and walls, and these should be encouraged further by inclusion within the policy text. We include brown roofs, as these are more often designed to encourage wildlife (green roofs can be monocultures), often replacing post-industrial habitats. This is supported by TAN 5 which states that development plans should include policies that 'Provide for the conservation, enhancement, sustainable management and, where appropriate, the restoration of networks of natural habitats including wildlife corridors and other green space, and networks and chains of open space'. The area of parks and green spaces per 1000 population is a Welsh quality of life indicator, and improving access to natural greenspace is an objective within the Wales Environment Strategy and Welsh Government Strategy for Sport and Physical Activity. Suggested addition: development proposals should: (v) be designed where possible to include new green infrastructure or to complement existing green infrastructure Green infrastructure, such as green/brown roofs, green walls and green spaces can provide social and economic benefits as they help to soften the urban environs; mitigate for the urban heat island effect; filter airborne and gaseous pollutants; help to absorb noise pollution; provide a public amenity / green space; and are aesthetically pleasing. Green/brown roofs and walls also benefit the sustainability of the building itself by helping to regulate internal building temperatures and recycle rainwater. In addition green walls and roofs can also pave the way for biodiversity in buildings and provide a valuable part of a wider SUDs scheme. Green infrastructure can contribute to more innovative and attractive design scheme, which will help our environment adapt to the impacts of climate change, as well as helping to mitigate the causes.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	

Item	Question	Soundness Test	Tick-box reply
1	1	I think the LDP is sound.	No
6	6	A new policy	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D17//GP05	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.40

Policy: GP05

Summary: Refer to mitigation hierarchy

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number GP5	
7	7	A new paragraph or new text.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Whilst Gwent Wildlife Trust strongly supports the principles behind Policy GE5, we feel it could reflect national policy more closely and give greater clarity in places.

We support part i) as it emphasises the positive contribution that development can make towards national and local nature conservation plans. We suggest the following amendment for clarity: The proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including the incorporation of existing and new features on or off the site ...

We feel that part ii) could be strengthened through further reference to the mitigation hierarchy (TAN 5 2009, section 2.4), as it is possible that some developments will involve a biodiversity loss which requires some form of compensation. This will also complement LDP policy CE12, as this refers to mitigation and compensation. We also strongly recommend incorporating the principle of 'net benefit for biodiversity' listed in TAN 5 (2009): 'The town and country planning system in Wales should ...look for development to provide a net benefit for biodiversity with no significant loss of habitats or populations of species, locally or nationally'. This is stronger than the principle of 'no net loss' stated in the text, and again emphasises the positive contribution that development can make to biodiversity. We also recommend explaining terminology, particularly 'features of importance for nature conservation'.

We suggest the following amendment to part ii)

The proposals demonstrate how they avoid, mitigate or compensate for negative impacts on biodiversity and features of importance for nature conservation; ensuring that there are no significant adverse effects on areas of nature conservation interest or protected and listed habitats and species, and providing a net benefit for biodiversity.

Terms can be explained within the text:

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

Areas of nature conservation interest can include sites protected at the International, European, National and Local level; protected and listed species and habitats include those species with legal protection, and species and habitats listed in the UK, Welsh or Local Biodiversity Action Plans, and the Section 42 List of Species and Habitats of Principal Importance for Conservation of Biological Diversity in Wales.

The precautionary principle is not mentioned. As this is listed as a principle of sustainable development in TAN 5 (2009), which states that 'Where relevant, local development plans should include policies that... Apply the precautionary principle where appropriate'. As the county includes many complicated natural systems, and the impacts of development are often difficult to predict, this is particularly important.

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

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

It may be helpful for paragraph 3.27 to refer to Policy CE12.

We are supportive of measures within the text to promote protection of water resources, trees and the landscape. We also welcome the recognition of the contribution that development can make to nature conservation and green infrastructure through sensitive landscaping.

15	15	Do you want to speak at Public Examination?								
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Yes

16	16	Subject to speak on at Examination								
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Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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Item Question	Soundness Test	Tick-box reply
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1 1	I think the LDP is sound.	No
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13 13	Test of Soundness	
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This policy does not have regard to national policy (C2).

Item Question	Tick-box reply
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6 6	A new policy	Yes
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126.D18//CE01	Gwent Wildlife Trust		28/05/2012	<input type="checkbox"/>	E	C	M
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Document: Deposit Plan, p.47

Policy: CE01

Summary: Support measures to protect the countryside, open spaces and landscape.

Item Question	Representation Text	Tick-box reply
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2 2	Policy Number	
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CE1

14 14	Representation	
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Gwent Wildlife Trust supports measures to protect open spaces, the countryside and landscape.

15 15	Do you want to speak at Public Examination?	Yes
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16 16	Subject to speak on at Examination	
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Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question	Soundness Test	Tick-box reply
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1 1	I think the LDP is sound.	No
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Item Question	Tick-box reply
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10 10	Delete an existing site.	No
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D19//CE02	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.47

Policy: CE02

Summary: Support protection of open spaces, countryside and landscape.

Item Question Representation Text

14 14 Representation
Gwent Wildlife Trust supports measures to protect open spaces, the countryside and landscape.

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound. No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D20//CE03	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.48

Policy: CE03

Summary: Supports the enhancement of wildlife corridors along major transport routes.

Item Question Representation Text

2 2 Policy Number

CE3

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D21//CE04	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.49

Policy: CE04

Summary: Recommend mention of the nature conservation importance of the River Usk and its status as a SAC.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CE4	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust recommends mention of the nature conservation importance of the River Usk and its status as a SAC within the text, so that developers are aware that riverfront development is likely to require HRA.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
126.D22//CE05	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.49

Policy: CE05

Summary: Proposals for local food/plant production should respect environmental and wildlife considerations.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number CE5	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust strongly supports protection of local environmental spaces. We welcome recognition of their many functions (ie provision of multiple ecosystem services) and support the efforts made by the council to increase access to natural greenspace through the CCW ANG Toolkit. We welcome the additional protection that this gives to many urban SINCS. Whilst we generally welcome community food production schemes, developers should be aware that these schemes will only be acceptable if they do not impact on the nature conservation interest of the site, in order to comply with policy GP5. We recommend amending paragraph 4.14: Proposals for local food/plant production on environmental spaces will be supported provided that they comply with other relevant council policies and that the proposed development would enhance the social and environmental amenities and economic well being of the neighbourhood and the proposal will be used by nearby residents.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
126.D23//CE12	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.56

Policy: CE12

Summary: Support policy but should be revised to reflect the objectives of TAN 5 to achieve a net benefit to biodiversity

Item	Question	Representation Text	Soundness Test
2	2	Policy Number CE12	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust supports the protection of local wildlife sites. However, we believe the policy should further reflect the objective of TAN 5 (2009) to achieve a net benefit to biodiversity: 'The town and country planning system in Wales should ...look for development to provide a net benefit for biodiversity with no significant loss of habitats or populations of species, locally or nationally'. We recommend that the policy is amended to reflect this: Proposals affecting locally designated sites will only be permitted where: i) There would be no overall loss of the nature conservation resource for which the site has been designated, and the development delivers a net biodiversity benefit. Gwent Wildlife Trust supports the significance and protection given to Section 42 and LBAP habitats, and ecological networks, but believes that paragraph 4.42 should also include reference to the UK BAP, in order to reflect TAN 5 (2009) which states that development plans should include policies that 'Create strong links to national and local Biodiversity Action Plans and include provision for helping to meet their targets by habitat creation and management'. We would also welcome further clarification of 'green corridors/ecological networks' (see our suggestion regarding policy GP5). We recommend amending paragraph 4.42 'Locally designated sites are important to the overall biodiversity of Newport. They include Local Nature Reserves (LNRs), Sites of Importance for Nature Conservation (SINCs), Regionally Important Geological and/or Geomorphological Sites (RIGs), Wildlife Trust Nature Reserves, 'Green Corridors' / 'Ecological Networks' and those habitats and species identified within the National and Local Biodiversity Action Plans (UKBAP and LBAP), and Section 42 Habitats and Species of Principal Importance for the Conservation of Biological Diversity in Wales, the list for which is subject to periodic review.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness This policy does not have regard to national policy (C2).	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>		<i>Tick-box reply</i>								
6 6	A new policy									Yes

126.D24//CE13 Gwent Wildlife Trust 28/05/2012 E C M

Document: Deposit Plan, p.58

Policy: CE13

Summary: Support the protection of the Coastal Zone

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number CE13	
14 14	Representation Gwent Wildlife Trust supports the protection of the Coastal Zone, and welcomes recognition of the special features of the Gwent Levels.	
15 15	Do you want to speak at Public Examination?	Yes
16 16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D25//CE14	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.60

Policy: CE14

Summary: Support policy that encourages renewable energy proposals whilst protect nature conservation interests.

Item Question Representation Text

2 2 Policy Number
CE14

14 14 Representation

Gwent Wildlife Trust strongly supports policy that encourages renewable energy whilst protecting nature conservation interests. We particularly welcome the protection of the special qualities of the Gwent Levels.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D26//H01	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Welcome the recognition that several of the new housing allocations will need to include special measures to protect the River Usk SAC.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number H1	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trust welcomes the recognition that several of the new housing allocations will need to include special measures to protect the River Usk SAC. It should also be noted that several of these allocations have the potential to affect SINCs and UKBAP habitats, and should take appropriate steps to protect these nature conservation interests.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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126.D27//H01.56	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.64

Site: 425/ Woodland Site

Delete Site

Policy: H01.56

Summary: Exclude the SINC from the Woodland Site, Ringland allocation.

Item Question Representation Text

2 2 Policy Number

H1(56) - Woodland Site, Ringland.

9 9 Amend the boundaries of an existing site.

Yes

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).

Item Question

Tick-box reply

6 6 A new policy

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D28//H10	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.69

Policy: H10

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

Item Question Representation Text

2 2 Policy Number
H10

14 14 Representation
Gwent Wildlife supports the protection of species affected by agricultural building conversions.

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound. No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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126.D29//H16.03	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Object to the allocation of the Gypsy and Travellers allocation at the Former Army Barracks Camp Site, Nash

Item Question Representation Text

2 2 Policy Number

H15; H16

7 7 A new paragraph or new text.

Yes

14 14 Representation

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

TAN 5 2009 states that development plans should: 'Safeguard nationally and locally designated sites whilst making clear the relative weight to be attached to the different designations'.

Allocation of development on a SSSI would be contrary to the above policies and SP1, SP9 and GP5 within the LDP. TAN 5 (2009), states that development plans should 'Make proposals for necessary new development in ways and at locations that are consistent with the nature conservation objectives and policies in the plan itself and with national planning policies' therefore the allocation should be removed, and the policy amended appropriately.

It should also be noted within the text that all of these allocations are likely to have negative impacts on biodiversity that will require mitigation or compensation should proposals be brought forward.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).

Item Question

Tick-box reply

6 6 A new policy

Yes

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D30//EM01.01	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.73

Site: 430/ Duffryn

[Delete Site](#)

Policy: EM01.01

Summary: Object to the allocation of the Employment allocation at Duffryn

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		EM1	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gwent Wildlife Trust strongly objects to employment allocations on sites designated for their nature conservation interest -SSSIs and SINCs. Duffryn, East of Queensway Meadows and Gwent Europark all include land designated as SSSI, and Newport Docks and Solutia both include land designated as SINCs.

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

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

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

When we objected to the allocation of these sites in previous stages, the council response was that 'On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done' (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat (accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few.

Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

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

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

Furthermore, this policy is inconsistent with SP17, which allows for provision of 165ha of employment land within the plan period. The allocation of 510ha of employment is over three times this area, which seems wholly unnecessary. Removing or amending all of the allocations to avoid nationally designated sites would leave 350.5ha, removing both national and local sites would leave 268.75ha - still more than the area judged to be needed, and thus allowing flexibility and choice for developers. In the unlikely event that an employment opportunity arose of such a scale and degree of importance that it necessitated destroying part of a nationally important site (and overriding the Welsh Government's forthcoming central organising principle of sustainable development), this could be addressed through a departure from the plan.

In conclusion, employment allocations on SSSIs and SINCs represent a gross over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should aim to direct development to sustainable locations, therefore these sites should be amended or deleted to avoid national and local designated sites.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

<i>Item Question</i>	<i>Soundness Test</i>
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1 1 I think the LDP is sound.

No

13 13 Test of Soundness

This policy does not regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).

<i>Item Question</i>	<i>Tick-box reply</i>
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6 6 A new policy

Yes

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D31//EM01.02	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Site: 417/ East of Queensway Meadows

Delete Site

Policy: EM01.02

Summary: Object to employment allocation at East of Queensway Meadows

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		EM1	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gwent Wildlife Trust strongly objects to employment allocations on sites designated for their nature conservation interest -SSSIs and SINCs. Duffryn, East of Queensway Meadows and Gwent Europark all include land designated as SSSI, and Newport Docks and Solutia both include land designated as SINCs.

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

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

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

When we objected to the allocation of these sites in previous stages, the council response was that 'On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done' (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat (accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few.

Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

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

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

Furthermore, this policy is inconsistent with SP17, which allows for provision of 165ha of employment land within the plan period. The allocation of 510ha of employment is over three times this area, which seems wholly unnecessary. Removing or amending all of the allocations to avoid nationally designated sites would leave 350.5ha, removing both national and local sites would leave 268.75ha - still more than the area judged to be needed, and thus allowing flexibility and choice for developers. In the unlikely event that an employment opportunity arose of such a scale and degree of importance that it necessitated destroying part of a nationally important site (and overriding the Welsh Government's forthcoming central organising principle of sustainable development), this could be addressed through a departure from the plan.

In conclusion, employment allocations on SSSIs and SINCs represent a gross over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should aim to direct development to sustainable locations, therefore these sites should be amended or deleted to avoid national and local designated sites.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

<i>Item Question</i>	<i>Soundness Test</i>
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1 1 I think the LDP is sound.

No

13 13 Test of Soundness

This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within LDP (CE1).

<i>Item Question</i>	<i>Tick-box reply</i>
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6 6 A new policy

Yes

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D32//EM01.04	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Site: 423/ Solutia

Delete Site

Policy: EM01.04

Summary: Object to the employment allocation at Solutia

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		EM1	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gwent Wildlife Trust strongly objects to employment allocations on sites designated for their nature conservation interest -SSSIs and SINCs. Duffryn, East of Queensway Meadows and Gwent Europark all include land designated as SSSI, and Newport Docks and Solutia both include land designated as SINCs.

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

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

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

When we objected to the allocation of these sites in previous stages, the council response was that 'On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done' (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat (accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few.

Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

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

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

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In conclusion, employment allocations on SSSIs and SINCs represent a gross over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should aim to direct development to sustainable locations, therefore these sites should be amended or deleted to avoid national and local designated sites.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
<p>Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.</p>										
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
<p>This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).</p>										
<i>Item Question</i>						<i>Tick-box reply</i>				
6 6	A new policy					Yes				
10 10	Delete an existing site.					Yes				

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D33//EM01.05	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Policy: EM01.05

Summary: Object to the Employment allocation at Newport Docks

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number EM1	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gwent Wildlife Trust strongly objects to employment allocations on sites designated for their nature conservation interest -SSSIs and SINCs. Duffryn, East of Queensway Meadows and Gwent Europark all include land designated as SSSI, and Newport Docks and Solutia both include land designated as SINCs.

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

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

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

When we objected to the allocation of these sites in previous stages, the council response was that 'On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done' (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat (accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few.

Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

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

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In conclusion, employment allocations on SSSIs and SINCs represent a gross over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should aim to direct development to sustainable locations, therefore these sites should be amended or deleted to avoid national and local designated sites.

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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
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<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
<p>This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).</p>										
<i>Item Question</i>						<i>Tick-box reply</i>				
6 6	A new policy					Yes				
10 10	Delete an existing site.					Yes				

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D34//EM01.06	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Site: 427/ Gwent Europark

Delete Site

Policy: EM01.06

Summary: Object to the employment allocation at Gwent Europark

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		EM1	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gwent Wildlife Trust strongly objects to employment allocations on sites designated for their nature conservation interest -SSSIs and SINCs. Duffryn, East of Queensway Meadows and Gwent Europark all include land designated as SSSI, and Newport Docks and Solutia both include land designated as SINCs.

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

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When we objected to the allocation of these sites in previous stages, the council response was that 'On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done' (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat (accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few.

Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

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

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In conclusion, employment allocations on SSSIs and SINCs represent a gross over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should aim to direct development to sustainable locations, therefore these sites should be amended or deleted to avoid national and local designated sites.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
<p>This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).</p>										
<i>Item Question</i>						<i>Tick-box reply</i>				
6 6	A new policy					Yes				
10 10	Delete an existing site.					Yes				

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D35//EM01.01	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.73

Boundary
Change

Policy: EM01.01

Summary: Object to employment allocation at Duffryn

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number EM1	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Outlining the principles of sustainable development within planning policy PPW Ch4 (2011) includes 'respect for environmental limits, so that resources are not irrecoverably depleted or the environment irreversibly damaged. This means, for example, mitigating climate change, protecting and enhancing biodiversity, minimising harmful emissions, and promoting sustainable use of natural resources'.

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15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
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<i>Item Question</i>						<i>Tick-box reply</i>				
6 6	A new policy					Yes				
10 10	Delete an existing site.					Yes				

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D36//EM01.02	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.74

Site: 374/ Duffryn Employment Space

Boundary
Change

Policy: EM01.02

Summary: Object to Employment allocation at East of Queensway Meadows

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		EM1	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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A key objective within PPW Ch4 (2011) for the planning system to: Contribute to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems. In particular, planning should seek to ensure that development does not produce irreversible harmful effects on the natural environment and support measures that allow the natural heritage to adapt to the effects of climate change. The conservation and enhancement of statutorily designated areas and of the countryside and undeveloped coast; the conservation of biodiversity, habitats, and landscapes; the conservation of the best and most versatile agricultural land; and enhancement of the urban environment all need to be promoted'. Allocating development on statutory sites is likely to produce irreversible harmful effects, and does not contribute to their conservation or enhancement in any way.

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

When we objected to the allocation of these sites in previous stages, the council response was that 'On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done' (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat (accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few.

Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

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

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

Furthermore, this policy is inconsistent with SP17, which allows for provision of 165ha of employment land within the plan period. The allocation of 510ha of employment is over three times this area, which seems wholly unnecessary. Removing or amending all of the allocations to avoid nationally designated sites would leave 350.5ha, removing both national and local sites would leave 268.75ha - still more than the area judged to be needed, and thus allowing flexibility and choice for developers. In the unlikely event that an employment opportunity arose of such a scale and degree of importance that it necessitated destroying part of a nationally important site (and overriding the Welsh Government's forthcoming central organising principle of sustainable development), this could be addressed through a departure from the plan.

In conclusion, employment allocations on SSSIs and SINCs represent a gross over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should aim to direct development to sustainable locations, therefore these sites should be amended or deleted to avoid national and local designated sites.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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16	16	Subject to speak on at Examination								
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Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

<i>Item Question</i>	<i>Soundness Test</i>	
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness
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This policy does not have regard to national policy (C2) , and is contrary to objectives and other policies within the LDP (CE1).

<i>Item Question</i>		<i>Tick-box reply</i>
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6	6	A new policy
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Yes

10	10	Delete an existing site.
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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126.D38//EM01.05	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.74

Site: 398/ Newport Docks

Boundary
Change

Policy: EM01.05

Summary: Object to the employment allocation at Newport Docks

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
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2	2	Policy Number	
		EM1	

7	7	A new paragraph or new text.	Yes
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9	9	Amend the boundaries of an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Gwent Wildlife Trust strongly objects to employment allocations on sites designated for their nature conservation interest -SSSIs and SINCs. Duffryn, East of Queensway Meadows and Gwent Europark all include land designated as SSSI, and Newport Docks and Solutia both include land designated as SINCs.

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

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

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

When we objected to the allocation of these sites in previous stages, the council response was that 'On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done' (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat (accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few.

Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

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

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

Furthermore, this policy is inconsistent with SP17, which allows for provision of 165ha of employment land within the plan period. The allocation of 510ha of employment is over three times this area, which seems wholly unnecessary. Removing or amending all of the allocations to avoid nationally designated sites would leave 350.5ha, removing both national and local sites would leave 268.75ha - still more than the area judged to be needed, and thus allowing flexibility and choice for developers. In the unlikely event that an employment opportunity arose of such a scale and degree of importance that it necessitated destroying part of a nationally important site (and overriding the Welsh Government's forthcoming central organising principle of sustainable development), this could be addressed through a departure from the plan.

In conclusion, employment allocations on SSSIs and SINCs represent a gross over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should aim to direct development to sustainable locations, therefore these sites should be amended or deleted to avoid national and local designated sites.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
<p>Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.</p>										
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
<p>This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).</p>										
<i>Item Question</i>						<i>Tick-box reply</i>				
6 6	A new policy					Yes				
10 10	Delete an existing site.					Yes				

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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126.D40/IT1	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.82

Site: 431/ Coedkernew

Delete Site

Policy: T1

Summary: Object to the proposed train station at Coedkernew.

Item	Question	Representation Text
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2	2	Policy Number
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T1

7	7	A new paragraph or new text.
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Yes

14	14	Representation
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Gwent Wildlife Trust objects to the allocation of a new railway station at Coedcernew. Whilst we are generally supportive of the other measures within this section to improve transport integration and provide more public transport services, a new station at Coedcernew seems unjustified and would be environmentally damaging.

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

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

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

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

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

15	15	Do you want to speak at Public Examination?
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Yes

16	16	Subject to speak on at Examination
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Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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Item Question	Soundness Test
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1 1	I think the LDP is sound.	No
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13 13	Test of Soundness
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This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).

Item Question	Tick-box reply
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6 6	A new policy	Yes
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10 10	Delete an existing site.	Yes
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126.D41/T5	Gwent Wildlife Trust		28/05/2012	<input type="checkbox"/>	E	C	M
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Document:Deposit Plan, p.85

Policy: T5

Summary: Support policies to protect walking and cycling

Item Question	Representation Text
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2 2	Policy Number
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T5

14 14	Representation
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Gwent Wildlife Trust supports policies to protect walking and cycling routes, and the public rights of way network, including the Wales Coastal Path. We welcome development and extension of these routes, especially their connection to the green infrastructure network.

15 15	Do you want to speak at Public Examination?	Yes
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16 16	Subject to speak on at Examination
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Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question	Soundness Test
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1 1	I think the LDP is sound.	No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D42/T6	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.85

Policy: T6

Summary: Support policies to protect walking and cycling routes.

Item Question Representation Text

2 2 Policy Number

T6

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D43//T8	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.86

Policy: T8

Summary: Support policies to protect walking and cycling routes.

Item Question Representation Text

2 2 Policy Number
T8

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D44/CF04	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.102

Policy: CF04

Summary: Supports mention of nature conservation interest with respect to water-based recreation and riverside development.

Item Question Representation Text

2 2 Policy Number

CF4

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D45//CF05	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.102

Policy: CF05

Summary: Supports mention of nature conservation interests with respect to water based recreation and riverside development.

Item Question Representation Text

2 2 Policy Number

CF5

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D46//CF07	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.103

Policy: CF07

Summary: Support the protection of allotments.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number CF7	
14	14	Representation Gwent Wildlife Trust supports the protection of allotments, and the recognition of the contribution that allotments can make towards local biodiversity.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D47//CF10	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.105

Policy: CF10

Summary: Welcomes the preparation of a masterplan for Celtic Manor.

Item Question Representation Text

2 2 Policy Number
CF10

14 14 Representation

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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126.D48//CF15	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.108

Site: 432/ Percoed Lane School Site

Delete Site

Policy: CF15

Summary: Delete the South of Percoed Lane School site

Item Question Representation Text

2 2 Policy Number
CF15(i)

7 7 A new paragraph or new text.

Yes

14 14 Representation

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

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

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

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).

Item Question

Tick-box reply

6 6 A new policy

Yes

10 10 Delete an existing site.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
126.D49/W1	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.113

Policy: W1

Summary: Supporting text should give greater support to national policy.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number W1	
7	7	A new paragraph or new text.	Yes
14	14	Representation Gwent Wildlife Trusts welcomes the recognition that nature conservation interests are likely to be negatively affected by a waste management facility on Land south of Llanwern Steelworks. However, attention must also be drawn to the fact that the site is designated as a SINC, and therefore any development must comply with LDP policy CE12. Depending on technology used, the impacts through air (and potentially water) pollution could have impacts further afield, including the Severn Estuary and Wentwood. Any proposal would need to be subject to rigorous EIA and HRA assessments. Additionally, we feel there should be commitment from the council towards the use of the Best Practicable Environmental Option (BPEO) (TAN 21(2001)) and the aims of the National Waste Strategy for Wales (NWSW), which states that to support sustainable development 'waste management should be carried out in a way that does not place undue social, economic or environmental burdens on either present or future generations and that ensures social equity, effective protection of the environment, the prudent use of natural resources and the maintenance of high and stable economic growth and employment'. We recommend the following changes to give greater support national policies and further demonstrate the council commitment to sustainable development. The South of Llanwern site is one of the 2 shortlisted Prosiect Gwyrdd preferred bidders (the only one in Newport). Proposals for a waste management facility on this site would need to be of a high design standard reflecting its position along the Queensway route, and should use latest technologies to provide the most sustainable waste management solutions. Environmental considerations would need to be addressed through EIA and HRA with specific regard to the Nash and Goldcliff SSSI and the Spencer Works SINC, as well as potential impacts on nature conservation interests further afield. Proposals would need to accord with relevant national guidance and regulations, as well as other policies of the Plan including the General Development Principles Policies. The Council will liaise with the Environment Agency Wales and the Countryside Council for Wales to assess the proposals put forward for the site.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness This policy does not have regard to national policy (C2).	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
126.D50//Monitori	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	O		M	

Policy: Monitoring Framework

Summary: Object to the omission of an indicator for access to natural greenspace.

Item	Question	Representation Text	Soundness Test
3 3	Paragraph or section number(s)	Monitoring indicators; 12.21	
7 7	A new paragraph or new text.		Yes
14 14	Representation	Whilst Gwent Wildlife Trust supports the monitoring indicators selected for nature conservation, we object to the omission of an indicator for access to natural greenspace. As the protection and creation of greenspace is covered by several policies (SP1, SP4, SP12, GP1 and CE5) and indicator to monitor this should be included. Natural greenspace has notable health benefits, but also contributes to biodiversity, air quality, noise suppression and general amenity. The council has recently undertaken a greenspace assessment using the CCW Greenspace Toolkit, which could be used as the basis for an indicator. We therefore recommend including percentage of population living within 300m of accessible natural greenspace as an indicator. Alternatively, or additionally, losses and creation of environmental space could be monitored through the planning system.	
15 15	Do you want to speak at Public Examination?		Yes
16 16	Subject to speak on at Examination	Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.	
1 1	I think the LDP is sound.		No
13 13	Test of Soundness	This monitoring indicator does not fully reflect other policies within the LDP (CE1).	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
126.D51	Gwent Wildlife Trust			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.152

Summary: Supports the readoption of Wildlife SPG and production of Gwent Levels SPG

Item Question Representation Text

3 3 Paragraph or section number(s)
Chapter 14 (SPG)

14 14 Representation

Gwent Wildlife Trust strongly supports the re-adoption of the Wildlife and Development SPG. We welcome the production of site-specific masterplans and development briefs, and would like to be consulted on major revisions. We also welcome production of SPG for trees, and would welcome involvement in the consultation. The Celtic Manor masterplan proposed in policy CF10 appears to have been omitted.

Gwent Wildlife Trust strongly supports the production of a Gwent Levels SPG, and would like the opportunity to be involved in its development. The Gwent Levels has been identified as a Wildlife Trusts Living Landscape and RSPB Futurescape, and both organisations are therefore deeply committed to the protection and enhancement of the area at a landscape scale. We hope that an SPG can be produced jointly with Cardiff City Council and Monmouthshire County Council to provide consistent and coherent guidance for development on and around this important landscape.

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination

Gwent Wildlife Trust deeply concerned by significant allocations for development on the Gwent Levels SSSI, which have the potential to cause irreversible damage to nature conservation interests and negatively affect ecosystem function. These unsustainable developments would be extremely damaging to Newport's best environmental assets, in addition to being contrary to policy and the councils own vision to provide a place where people live in harmony with the natural environment. Gwent Wildlife Trust has identified the Gwent Levels as a Living Landscape area, recognising its importance for people and wildlife, locally and within the national context. We will therefore take every opportunity to protect this special and unique area.

Item Question Soundness Test

1 1 I think the LDP is sound. No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
134.D1//H01	Redrow Homes (SW) Ltd	Harmers Limited		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 296/ Pentrepoeth

New Site

Policy: H01

Summary: Allocate land between Pentrepoeth Road and Penylan Road, Bassaleg for housing.

Item Question Representation Text

2 2 Policy Number

H1 Housing Sites

3 3 Paragraph or section number(s)

5.1 to 5.10

11 11 Site Name

Pentrepoeth Road, Bassaleg

12 12 Site Reference

65.C2

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Whilst it is agreed that the LDP should focus primarily on the development of previously developed land, in order to provide for a range and choice of sites and avoid an over concentration of sites in a limited geographical area where residual land values are low it would be appropriate to allocate additional greenfield sites in sustainable locations throughout the city. This would provide additional flexibility in the land supply and help to ensure that the LDP housing requirement including affordable housing targets will be delivered. According to the Housing Background Paper some 68% of the existing housing land bank is concentrated in 3 wards which will be exacerbated by the addition of the LDP allocated sites which are concentrated in the same area. This over concentration of sites will make it extremely difficult to market the new dwellings with the result that the LDP strategy of providing 8750 will not be achieved. Building rates over the last 15 years have averaged 464 per annum and unless there is a wider range and choice of sites the LDP requirement of 583 per annum (+25%) will not be achieved. The alternative site, which is located between Pentrepoeth Road and Penylan Road, Bassaleg, would provide a sustainable settlement extension on a site which is deliverable. The site is in the control of Redrow Homes, there are no constraints and it would make an important contribution to

meeting the housing requirement of the LDP. The site area is approximately 10 has and it could accommodate in the order of 225 new dwellings (30% affordable) on a net development area of approximately 7.5 has. The merits of the site have been recognised previously. In the mid 1990s the site formed part of a large area which was subject to a planning inquiry, the Inspector recommending approval but being dismissed by the Secretary of State in 1997 primarily on the grounds of prematurity. The site was also identified as being suitable for residential development in structure plan documents where it was recognised that development of the site would have minimal visual impact on adjoining development. The land was also promoted through the UDP and the Inspector stated that, "It appears that there are no insurmountable barriers to the provision of a safe access and adequate infrastructure to serve the site or of making any necessary improvements to the local road network. Given its proximity to local services and bus routes, the site is in a sustainable location". He also continued to state,

"The inward facing nature of the local landform means that development on the site would not be widely visible from the open countryside to the south-west". The Inspector also recommended that the green wedge designation, which was identified at this time, should be removed from this area accepting that the development of the site would not lead to coalescence. As noted above the site has an inward facing character. There is a stream which runs through the centre of the site, in a roughly south westerly to north easterly direction, and the site slopes inwards and downwards towards this feature. The stream corridor, together with copses and hedgerows of interest would be retained and enhanced within the development scheme. The stream corridor would become a walkway site feature. Part of the land has previously been developed as a nursery, but this area is now derelict, whilst part of the land is used for the grazing of ponies. The remainder of the site comprises agricultural land. Several footpaths cross and link into the site, some informal paths have been created by school children and these can be formalised to create Safe Routes to School.

The site has been designated as special landscape area but the site is not of landscape merit and should be excluded from this designation. In addition, the local land form means that there is restricted visibility into this site from its environs. The site is located within 400 metres of the nearest bus stops and the locality benefits from frequent services. Rogerstone Railway Station is within 5 kilometres of the site. The development of the site offers the opportunity for improved footpath links to serve the community. The site benefits from a wide range of community services, including primary and comprehensive schools, sports and leisure facilities, local stores, public houses and places of worship. There is a range of employment opportunities available locally, including at the nearby Rogerstone Industrial

Estate. The services, facilities and employment opportunities of Newport City centre are readily accessible

to the site via regular public transport. The site is in a highly sustainable location, it would have an acceptable visual impact and it is fully deliverable. There are therefore no constraints to the development of the site and it would therefore make a valuable contribution to meeting the LDP's housing requirement, providing a diversity of site.

15	15	Do you want to speak at Public Examination?								
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Yes

16	16	Subject to speak on at Examination								
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I wish to speak in support of the alternative site submission and attend the Hearing in order to ensure that the matter is given due consideration.

Item Question	Soundness Test	
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1	1	I think the LDP is sound.								
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No

13	13	Test of Soundness								
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CE2 There is an over reliance on the contribution to be made to the dwelling requirement from development on brownfield sites and insufficient range and choice of site available for development.

Item Question

Tick-box reply

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
8 8	Add a new site.		Yes							
134.D2//H04	Redrow Homes (SW) Ltd	Harmers Limited		28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.66

Policy: H04

Summary: LDP does not include an authority wide target expressed as numbers of affordable housing.

Item	Question	Representation Text	Soundness Test
2 2	Policy Number	H4	
3 3	Paragraph or section number(s)	5.14	
7 7	A new paragraph or new text.		Yes
14 14	Representation	<p>The LDP does not conform with the advice in paragraph 9.2.16 of Planning Policy Wales which requires development plans to include an "authority wide target for affordable housing (expressed as numbers of homes) based on the LHMA and identify the expected contributions that the policy approaches identified in the development plan (for example, site thresholds, site specific targets, and rural exception sites) will make to meeting this target". The LDP is deficient as it does not include an authority-wide target expressed as numbers of affordable homes.</p> <p>As the majority of the sites identified in H1 already have planning consent the contribution from these sites should be known from the Section 106 agreements which should be taken into account when determining the site specific targets for the allocated sites.</p> <p>In determining the site specific targets Planning Policy Wales also requires the anticipated level of finance available for affordable housing, including public subsidy, and the level of developer contribution that can realistically sought. With regard to this assessment account will have to be taken of the Affordable Housing Viability Assessment (March 2012) which identifies that land in the east of Newport and in Malpas and Bettws have low residual land values even without taking account of an site abnormal costs will not allow any significant quantity of affordable housing to be delivered.</p>	
15 15	Do you want to speak at Public Examination?		Yes
16 16	Subject to speak on at Examination	The lack of an affordable housing target and whether sites can deliver affordable housing is an important consideration in determining within the plan is sound.	
1 1	I think the LDP is sound.		No
13 13	Test of Soundness	C2	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
134.D3//H01	Redrow Homes (SW) Ltd	Harmers Limited		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Insufficient evidence to demonstrate that the LDP dwelling requirement will be delivered.

Item	Question	Representation Text	Yes
2	2	Policy Number H1	
3	3	Paragraph or section number(s) 2.38	
7	7	A new paragraph or new text.	Yes
14	14	Representation There is objection to the LDP strategy in relation to the supply of housing land which is focused on brownfield sites and includes many sites identified in the previously adopted UDP (para. 2.38). Policy H1 identifies sites to accommodate 10,913 dwellings by the 1st April 2026 with the majority of these, i.e. 8138 dwellings, consisting of commitments, sites subject to Section 106 Agreements or sites under construction. The UDP allocates nine "new" sites which are estimated to provide 2775 dwellings by 1st April 2026. However, four of the "new" allocated sites, H49, H50, H51 and H55 were allocated in the UDP and are undeveloped. These 4 sites are estimated to provide 894 dwellings by 2026 but on the basis that they have not yet been developed there is insufficient evidence to demonstrate that they will be developed in the plan period. The costs of developing housing sites have escalated and will continue to do so with further changes to national policy which together with S106 contributions and affordable housing requirements makes brownfield sites in low residual land value areas unviable. The housing landbank at the 1st April was made up of 84% residential permissions to be delivered on brownfield sites with a similar percentage of the new allocations also being brownfield. The problem with this over reliance on brownfield sites is that the majority of them are located in areas of low residual land values which is confirmed by the Newport City Council Viability Assessment (March 2012) which demonstrates that low land values exist in Newport East and suggest that a target of 10% would be appropriate in Newport East. However this percentage is optimistic as the methodology does not take into account on site abnormal costs and if they were to be taken into account the likelihood the likelihood is that they would not be viable. Policy H4 seeks a 30% affordable housing requirement on allocated sites but in reality as many of the sites are brownfield, have significant abnormal costs and are in areas of low residual values won't be able to deliver this requirement. It is likely that when all the costs of development are taken into account they will not be able to provide any affordable housing at all. A separate objection has been submitted to policy H4 and the lack of an overall housing target which should be based on the LHMA and identify the expected contributions deriving from the policy approaches in the plan including site thresholds and site specific targets. Not only are there concerns with the viability and deliverability of the brownfield allocated sites but there is also concern about the over concentration of several large sites within a limited area. The Housing Background Paper in paragraph 10.3 refers to the three wards of Llanwern, Liswerry and Pillgwenlly making up 68% of the housing land bank which means that there is an inadequate range and choice of housing sites throughout the rest of the city. It also means that the assumed rates of completions will not be achieved as markets are limited if they are confined to a small area. In addition the assumed rate of completions in the LDP of site H47 Glan Lyn is far too optimistic and won't be achieved. It is assumed that the site will deliver approximately 3000 units in the plan period which requires 200 completions per annum. The site is being developed by one housebuilder and a more realistic assumption would be approximately 1500 completions in the plan period. In conclusion the evidence base does not demonstrate that there is sufficient flexibility in the strategy to provide any confidence that the LDP dwelling requirement will be delivered. Consideration needs to be given to alternative deliverable allocations in other parts of the city which are in sustainable locations.	
15	15	Do you want to speak at Public Examination?	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
I wish to speak about the deliverability and viability of the allocated sites as this is a fundamental issue relating to the soundness of the plan.										
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>								
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
CE2										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
136.D1//H04	The Home Builders Federation Ltd			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.66

Policy: H04

Summary: LDP should include an overall target for the delivery of affordable housing.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		H4	
7	7	A new paragraph or new text.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

HBF Supplementary Paper for Policy H4

1.Target for Affordable Housing Delivery

The LDP does not set an overall target for affordable housing delivery. PPW is explicit in the need for the LDP to set a target for the delivery of affordable housing and then to identify the mechanisms by which this target will be achieved.

In light of the above, the LDP does not conform to National Guidance and therefore contravenes Soundness Test C2.

2.The results of the viability assessment and relationship to the policy

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

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

2.1The theory of Section 106 and Land Valuations

Paragraph 2.5 of the viability assessment states that the existing use value of the site, or a realistic alternative use value for a site (e.g. commercial), will play a role in the mind of the land owner in bringing the site forward and thus is a factor in deciding whether a site is likely to be brought forward for housing. However, we do not believe that viability can be defined simply in this respect. A residual value falling below the existing use value is a good measure to indicate that a development would definitely not be viable, but it is not a sound indicator of viability itself, particularly when existing use values, such as industrial and commercial, are so far adrift from the actual residential land values experienced within the authority. This would also apply to greenfield and agricultural land values, as these values are even lower again. As the assessment states, a positive residual value is by no means a guarantee to demonstrate viability and as such, when assessing what a suitable residential land value might be, we believe it is important to fully consider the evidence with respect to current land values and the values at which current (or very recent) transactions are taking place, in order to ensure the assessment is sound and robust.

2.2Other section 106 (and other) contributions

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

In term of the general assumption with respect to planning obligations, we are concerned that the £5,000 assumption might represent a severe under estimation of the likely costs levied on development. For instance, the strategy of the LDP relies heavily on the use of planning obligations to rectify the constraints and barriers to development, as well as providing benefits such as education, transport and open space facilities etc. Given that a vast majority of the sites allocated for development within the LDP have many constraints, it is likely that additional costs will be required in order to remedy these constraints, which will either be secured via section 106 contributions, or will impact on the ability to secure such contributions.

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

2.3Relationship of the viability assessment to the LDP Strategy

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

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Clearly if the cost of remediating constrained sites is to be borne by land values, reference to this must be included within the viability assessment in order to ensure the level of affordable housing assumed to be viable is sound and robust. The Council might argue that it would be difficult to include such site specifics in a high level assessment, however, what use is an assessment to inform the delivery of affordable housing, which is based on a type of development that is not proposed to be delivered in Newport?

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

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

3.The additional requirements of development

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

In terms of the above, these principles for prioritisation are completely missing from the affordable housing viability assessment, which we believe leaves a considerable hole in the soundness of the assessment and its recommendations.

Firstly, it is clear that the assessment has been undertaken on a notional one hectare site, which is free from any abnormal constraints and therefore, if the LDP prioritises the delivery of constrained sites, it seems logical that the assessment should recognise this and provide some leeway in the assessment to allow for such costs. In this respect, our members have stated that the approximate costs of remediation and site constrains normally amount to roughly £250,000 per acre (£617,500 per hectare), which is a substantial cost that could have a huge bearing on the viability of potential developments in Newport.

In addition to this, the LDP expects developers to take account of all potential planning obligations as required by the various policies within the plan. We have described above how we believe the cost of planning obligations is likely to be a lot higher than that which was experienced previously and therefore, the £10,000 benchmark value would provide a more robust assumption for the assessment to consider with respect to future development.

Further to the above, the assessment has also omitted two substantial costs to development of housing in Wales, which are required as a result of national guidance; namely the current sustainable buildings standard (Code 3 plus 1 energy credit) and the proposed changes to Part L of Building regulations, which is due to be introduced in 2013, and will therefore be in effect before the adoption of the LDP.

In terms of the national sustainable buildings standard, the Welsh Government has set a policy requirement for all new development to achieve Code 3 plus 1 energy credit under ENE1. Even though the assessment states that the cost of achieving Code level 3 is assumed to be counted within the build costs, our members have stated on many occasions that this simply is not the case and the costs described by the Three Dragons toolkit represent build cost without any additional estimations for Code levels. In terms of the actual cost of achieving the Welsh Governments sustainable building standard, the general consensus from our members is that it can cost an additional £8,000 per plot, over and above the level at which our members are currently building. Therefore, we believe the assessment has significantly underestimated the cost of developing to the WG's sustainable buildings standard.

In terms of the changes proposed to Building Regulations, the current proposal from the Welsh Government is to alter Part L to require a 55% increase from 2006 Part L Building Regulations standards. The WG has undertaken some preliminary research on the potential cost of achieving this standard and they estimate that it will cost a further £8,000 per plot, over and above the cost required to build to the current national sustainable buildings standard. As such, when the 55% increase is introduced in 2013, the total cost on development would be an additional £16,000 to the build cost of each home, or an additional £480,000 over a 30 unit development. It should be noted that this cost will have a real and tangible impact on development in Newport, as it will be in force before the LDP is adopted.

Furthermore, we also believe it is important to consider another WG requirement for the house building industry that has been announced and recently passed by the Government. The requirement for fire sprinklers in all new homes has now become legislation and Ministers are keen to ensure this requirement is considered appropriately. Again, we have discussed the potential cost of this with our

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members, and considering the vast amount of research that has been undertaken to identify the potential cost, the consensus is that it would add approximately £5,000 to the build cost of each dwelling. As such, we believe the assessment should also leave some flexibility for this requirement to be satisfied, as it will clearly have a substantial impact on the viability of development in many areas of the Newport.

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

- Cost of site remediation works = £617,500 per hectare
 - The potential cost of future planning obligations = an additional £5,000 per plot or £150,000 over a 30 unit development
 - The cost of achieving the current sustainable buildings standard = £8000 per plot or £240,000 over a 30 unit development.
 - The cost of achieving the proposed changes to Part L of building regulations = £16,000 (including cost of achieving sustainable buildings standard) or £480,000 over a 30 unit development.
 - The cost of installing fire sprinklers = £5000 per plot or £150,000 over a 30 unit development
- Total cost = £1,397,500 per hectare (assuming 30 units per hectare)

In terms of the above, it is evident that the assessment has potentially underestimated the cost of developing land in Newport by nearly £1.4 million. This will clearly have a major impact on the viability of development in many areas of the authority, particularly in areas such as Newport West and Newport East, which have some of the lowest land values, yet are expected to deliver the greatest volume of development.

For example, if you consider Newport East which is the area containing the wards of LLanwern and Llyswerry, and you subtract this figure from the residual land value at 30% affordable housing and 30 DPH provided for Newport East within the viability assessment (£60,000 per hectare), the resultant land value is £-1,337,500. To further highlight this point, if you also subtract the value from residual land values in Caerleon (£1,080,000), the resultant land value would be £-317,500.

Therefore, it is clear that development in all areas of Newport would be completely unviable at 30% affordable housing if all these costs are accounted for, given that land values would fall into negative territory. In fact, when these costs are included, land values fall into negative values in the areas that are proposed to deliver the majority of development, which is clearly a major issue that has not been addressed by the assessment.

In light of the above, we believe the affordable housing viability assessment is not based on up to date and robust evidence. We believe assessment has omitted a number of key requirements that will impact on the cost and viability of developing homes in Newport, particularly in the areas that are proposed to deliver the majority of the housing over the LDP period.

4. Conclusion

In light of the evidence above, we do not believe the affordable housing viability assessment has properly considered the cumulative impact of the cost of the physical requirements of development housing, in addition to the requirements of essential planning obligations and the imminent changes to building regulations. It is clear from our evidence that the impact on land values would be witnessed more acutely in the areas where the majority of housing is proposed, which would therefore have a detrimental impact on the delivery of affordable housing in those areas and hence, the delivery of any overall affordable housing delivery target that is ultimately set by the LDP.

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

5. Suggested Changes

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

5.2 The LDP should include an overall target for the delivery of affordable housing.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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We believe that more information needs to be provided on this issue and therefore it would be more appropriate to consider this evidence at the Examination rather than to rely on written representations at this stage.

Item Question Soundness Test

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness									
C2										
	<i>Item Question</i>									
6 6	A new policy		Yes							

Representation Details

by: Representation No

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136.D2//SP10	The Home Builders Federation Ltd			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Policy: SP10

Summary: Housing requirement should be increased and phasing limits should be removed.

Item Question Representation Text

2 2 Policy Number

SP10

7 7 A new paragraph or new text.

Yes

Representation Details

by: Representation No

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14	14	Representation								
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HBF Supplementary Paper for Policy SP10

We are concerned with the level of development proposed for the LDP. Our comments are provided below.

The Local Housing Market Assessment

We believe it is important that the LHMA is updated, as it is now 5 years out of date and therefore does not represent a robust analysis of the level of housing need and demand over the LDP period. The fact the LHMA is now 5 years out of date is a significant issue in itself.

The new Housing White Paper is explicit in its requirements for local authorities to have an up to date local housing market assessment and to fully understand their housing markets. Indeed, this was one of the key priorities for the Paper. The argument might be put that the White Paper is still in draft form, but it clearly shows the direction of travel for Welsh Government policy in this regard. Furthermore, if a local authority were to comment on any part of the White Paper, one would imagine that they could not raise any objection to a requirement that ensures they fully understand their own housing markets.

In light of the above, we believe the local housing market assessment should be updated as soon as possible in order to properly inform the evidence on housing requirements over the LDP period.

The need for affordable housing

Whilst we accept the council's decision to consider the Welsh Government's household projections as the starting point for analysing the appropriate level of housing required over the LPD period, we believe that more explanation needs to be provided on how the need for affordable housing has influenced the housing requirement set out by Policy SP10.

In this respect, it is clear that there is a dire need for affordable housing in the authority, which the plan will fall significantly short of addressing. For instance, Page 50 of the LHMA executive summary states that "overall, a total of 19,451 households across the sub-region were assessed as living in unsuitable housing due to one or more factors. 7,952 of these households were within Newport." Therefore, it is clear there is a significant level of affordable housing need in Newport that will not be resolved by the delivery mechanisms promoted through the LDP.

Also, given the significant issues with development viability, it is unlikely the LDP's current affordable housing target will be met in certain key areas of the authority and therefore, the path to delivering more affordable housing will clearly rely on an increase in the volume of homes delivered in total. (Please see our representations on affordable housing for more information on this).

In this respect, national guidance states that it is important for the local authority to consider the need to deliver affordable housing when planning for its total housing requirement for the LDP. Therefore, whilst we believe the current requirement of 8,750 dwellings allocated by Policy SP10 should be the absolute minimum adopted in order to meet certain requirements of LDP strategy, we also believe the policy should include increased flexibility in order to help reduce the acute affordable housing shortage experienced throughout the authority. In terms of identifying numbers, it would be more appropriate to assess the extent of the required increase, when the council has identified a numerical target for affordable housing delivery through the LDP, however, a rough analyses is provided below.

LHMA Housing Requirement

We are concerned with the apparent mismatch between the level of housing stated as required by the Council's evidence and the level of housing required by the LHMA. In this respect, paragraph 5.56 of the LHMA states that 3361 homes are required over the 5 years of the LHMA period. Extrapolating this over a 15 year period therefore indicates that 10,083 dwellings are required (or 672 per annum). In this respect, if we compare this figure with the requirement set out by Policy SP10 (8750 dwellings) it indicates a shortfall of 1,333 dwellings.

In order to properly compare of the level of housing growth within the LHMA with the level proposed by the LDP, we believe it is also important to test how the authority has performed in the years since 2007, when the LHMA was written, to ascertain whether or not the level of housing growth required by the assessment has been achieved. In this respect, when this exercise is carried out, it is clear there has been a significant shortfall in housing provision that we believe cannot simply be ignored.

In terms of figures, between the years 2007 and 2011 (the beginning of the LDP period) the level of housing growth within the authority was 2033 dwellings. However, according to the LHMA, the level of housing growth over this period should have been 2688 dwellings (672 x 4 years). Therefore, between the years 2007 and 2011 there has been a shortfall in housing provision of 655 dwellings when compared with the requirements of the LHMA.

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Again, in terms of figures, if this level of under provision is added to the LDP requirement, the resultant housing requirement becomes 9405 dwellings.

In addition to this, it is clear that if the level of housing development required by the LHMA is extrapolated in full over the LDP period, there would be an even greater shortfall. In this respect, if we assume the level of housing growth for the LDP should be that which is provided within the LHMA, then the LDP should set a housing requirement of 10,083 dwellings. Following this, given there has been a shortfall in provision since the creation of the LHMA and the beginning of the LDP of 655 dwellings, this should be added to the 10,083 dwelling figure to provide a rough estimate of the total number of homes required over the LDP period. In terms of figures, this would equal 10,738 dwellings.

However, we would advise caution with both these approaches. It is clear that the LHMA is now significantly out of date and therefore, we believe it is reasonable to suggest that if an update to the assessment were to be undertaken, the level of housing need would have increased, given the fact that the council has under provided when compared to the housing requirements set out within assessment. In light of this, simply adding any under provision to a running total should be treated with caution, as the actual level of housing need/requirement is likely to have grown throughout any periods of under provision.

In terms of the housing needs and requirements set out within the LHMA, it is clear that the proposed level of housing growth within the LHMA is significantly higher than the level of growth suggested by the LDP. It is also clear that there has been an under provision of housing, in the early years of the LHMA, which will also need to be addressed by the LDP. In light of these issues, it is evident that neither the level of affordable housing need nor the level of housing growth within the LHMA has been properly considered in the evidence to support the housing requirement within Policy SP10. Therefore, we believe this Policy is not founded on robust and credible evidence and is contrary to national guidance. The Policy therefore contravenes soundness tests C2 and CE2.

Under provision from the UDP

After studying the JHLAS process thus far, it is clear that there is still a significant residual requirement left over from the UDP. We do not believe this can be ignored, as the under provision over the UDP period will not only have contributed to a lack of supply, but will have also contributed to the level of need and demand experienced within the authority over this period.

In terms of the extent of this under supply, below is the 'Table A' from the latest adopted study (2010), which shows that the Council still has a residual requirement of 1506 dwellings. Therefore, there are still 1506 units outstanding as of 2010.

Table A from 2010 JHLAS
COUNTY UDP Housebuilding Requirement –

2006-2011

(5 years)

aCompletions

1st Jan 2006 – Apr 2010
(4.25 years)

bResidual Requirement

1st April 2010 – 1st Jan 2011
(0.75 years)

c=a-bAdditional Requirement

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1st Jan 2011 (4.25 years)	1st April 2015									
d=(a/5)*4.255 YEAR REQUIREMENT										
1st April 2010 – 1st April 2015										
e=c+dANNUAL BUILDING REQUIREMENT										
f=e/5Approved Land Available by 1st April 2015										
gTOTAL LAND SUPPLY IN YEARS										
h=g/f										
Newport										
3,700										
2194										
1506										
3145										
4651										
930										
3221										
3.5 years										

Following on from this, the Housing Background Paper states that the number of new residential units completed in 2011 was 401 dwellings. Therefore, as of 2011, there are 1105 dwellings (1506 – 401) still to be developed from the UDP requirement.

We do not believe this level of under provision cannot simply be ignored by the LDP and when considered in addition to the level of under provision highlighted by the LHMA, there is clearly a significant shortfall in housing provision in the years preceding the LDP, which needs to be recognised and addressed by the LDP.

Phasing

We are concerned with the phasing approach set out within the LDP. We accept that different levels of development might occur over different periods of the LDP timeframe, however, we do not believe

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it would be possible for the Council to successfully predict what will happen in such a precise manner.

We also accept that an indication of phasing can be helpful to inform monitoring and the direction of travel anticipated by the strategy, however, we believe to set out such precise limits in planning policy is more likely to hinder the delivery of the plan, rather than to offer more flexibility to ensure the level of development proposed is achieved. In this respect, we believe it would be far more appropriate to include the total headline figure within the policy and include the phasing, merely as an indication and not a requirement, within the reasoned justification.

In addition to the above, we believe the phasing approach is contrary to the requirements of National Guidance. For instance, paragraph 2.5.1 of PPW 2010 state that "Where phasing is included in an LDP it should take the form of a broad indication of the timescale envisaged for the release of the main development areas or identified sites, rather than an arbitrary numerical limit on permissions or a precise order of release of sites in particular periods." In this respect, an 'arbitrary numerical limit' seems to be proposed within this policy and therefore, the phasing plan is contrary to national guidance.

Conclusions and Suggested Changes

In terms of identifying an appropriate housing requirement for the LDP, we have identified a number of key issues that have not been given due consideration in the evidence to inform Policy SP10. Therefore, if we take the requirement within Policy SP10 as being the minimum level of development required in order to implement certain elements of the Council's strategy for growth and investment, the additional evidence that needs to be considered, as stated by PPW 2010, will clearly necessitate an increase in the overall housing requirement figure for the Plan period.

In terms of the above, our figures indicate that if the LHMA requirements, and the corresponding under provision against these requirements, are considered alongside the under provision from the UDP, the overall housing requirement for Policy SP10 should be in the region of 12,000 dwellings (11843 if our figures are taken precisely). We understand these figures might be a somewhat crude analysis of what is required, however, given the lack of robust evidence to consider the mismatch between level of development achieved in the past compared to what was required; and given the lack of an up to date LHMA, we believe these figures are warranted.

In addition to the above, we believe the phasing limits should be removed from Policy SP10. If any phasing is to be identified, it should be used as an indication of possible phasing throughout the plan period and should not be used to artificially limit the rate of development to different sections of the plan period.

Soundness Tests

In light of the evidence above, we believe Policy SP10 contravenes soundness tests C2, CE2, CE3 and CE4.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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We believe that more information needs to be provided on this issue and therefore it would more appropriate to consider this evidence at the Examination rather than to rely on written representations at this stage.

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C2 and CE2	
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<i>Item</i>	<i>Question</i>		<i>Tick-box reply</i>
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6	6	A new policy	Yes
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Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
136.D3//H01	The Home Builders Federation Ltd			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Appraisal of the deliverability of the sites in H1 should be undertaken and consideration given to the delivery of range and choice of housing.

Item Question Representation Text

2 2 Policy Number

H1

7 7 A new paragraph or new text.

Yes

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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HBF Supplementary Paper for Policy H1

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

Viability and Deliverability

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

Policy H1 of the Deposit LDP contains a list of allocated housing sites, many of which have significant constrains that will need to be addressed before development can proceed. This, coupled with the impending changes to national policy and the raft of planning obligations that will be sought on each site through the LDP, could have a major impact on the viability of many of the allocated sites, which in turn could impact on their ability to deliver a range and choice of housing, including affordable housing.

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

Turning attention to viability specifically, it is concerning to note that the only background paper related to development viability (the Affordable Housing Viability Assessment), takes no account of requirements of developing constrained sites. The study is based solely on the development of 'unconstrained land', which therefore casts some considerable doubt over its assumptions on the viability of the land for housing development in the LDP. We expand on our concerns with respect to the Affordable Housing Viability Assessment in a separate representation, however, it is clear that a viability assessment which bears no relationship to the land proposed for development in the LDP, will do very little to inform the important issues of viability and deliverability. Therefore, we believe a thorough appraisal of the deliverability of the sites in Policy H1 should be provided as a background paper, to ensure they are capable of being delivered in the face of such a challenging local and national policy environment.

Previously allocated housing sites

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

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

Range and Choice of Housing

In terms of the spatial strategy, we are concerned with the concentration of housing development in particular areas of the local authority. For instance, the Housing Background Paper (paragraph 10.3) states that the three wards of Llanwern, Llisbury and Pillgwenlly make up 68% of the housing land bank within the LDP. In this respect, there seems to be a concentration of housing in these areas, without any explanation as to why these particular areas have been selected, or the potential impact of this concentration of development, particularly with respect to the provision of a range and choice of housing, on the remaining areas of the authority.

In light of this, we believe more evidence needs to be produced to qualify the strategy proposed by the LDP and to provide more detail on the likely impact of the strategy on the rest of the authority with respect to availability and access to housing.

Delivery of major allocations

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We are concerned with the delivery rates proposed for the major housing allocation at Llanwern.

Throughout the Joint Housing Land Availability Study process there has been a substantial amount of discussion over the delivery rates proposed for the Llanwern Steelworks site over the JHLAS and LDP periods. In this respect, we are concerned that the level of development proposed in the plan for the site might be optimistic, which could have implications to the delivery of the housing requirement figure and the housing strategy.

In terms of delivery of the site, we do not wish to comment directly on how many units the site will actually deliver over the plan period. Nor do we wish to raise any objections to the proposed development of the site. However, we see little purpose in assuming an unsustainable rate of delivery for the site that might jeopardise the delivery of the housing requirement and the housing strategy of the LDP. We believe it would be far more appropriate to assume a sensible delivery rate for the site, whilst allowing flexibility in the land supply to account for the possibility that the site might not be delivered in full over the LDP period. In this respect, we would urge the Inspectorate to consider the evidence on likely delivery rates provided by our colleagues within the development industry and also the rate of development achieved in areas similar to Llanwern, when concluding on the most appropriate direction for the delivery of the site throughout the LDP period.

Soundness Tests

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

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

Suggested Changes

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

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

2.The LDP strategy should consider any potential impact on the wider authority, in terms of the delivery of a range and choice of housing, by the proposal to concentrate the majority of housing development in specific areas.

15	15	Do you want to speak at Public Examination?	Yes
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We believe that more information needs to be provided on this issue and therefore it would be more appropriate to consider this evidence at the Examination rather than to rely on written representations at this stage.

Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness CE2 and CE4	
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Item Question

Tick-box reply

6	6	A new policy	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
136.D4//GP01	The Home Builders Federation Ltd			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.36

Policy: GP01

Summary: Inappropriate to incorporate low and zero carbon energy sources - will be dealt with under Building Regulations.

Item Question Representation Text

2 2 Policy Number
GP1

7 7 A new paragraph or new text.

Yes

14 14 Representation

HBF Supplementary Paper for Policy GP1 - Criteria ii and iv

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

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

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

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

Suggested Change

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

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
C2 and CE4

Item Question

Tick-box reply

6 6 A new policy

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
136.D5//GP04	The Home Builders Federation Ltd			28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.39

Policy: GP04

Summary: Reference to SPG within the policy is contrary to national guidance and should be removed.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number GP4	
7	7	A new paragraph or new text.	Yes
14	14	Representation HBF Supplementary Paper for Policy GP4 - Criterion vi Criterion vi of policy GP4 states the following:- (vi) DESIGN AND BUILD NEW ROADS WITHIN PRIVATE DEVELOPMENT IN ACCORDANCE WITH THE HIGHWAY AUTHORITY'S ESTATE DEVELOPMENT DESIGN GUIDE AND RELEVANT NATIONAL GUIDANCE; Firstly, we believe the reference to adhering to national guidance is unnecessary and should be removed. Secondly, is not appropriate for policies within the LDP to refer the use of other plans or supplementary planning guidance. Essentially the Highway Authority's Estate Development Design Guide referred to above is a form of supplementary planning guidance. In order to support this, paragraph 5.2 of LDP Wales clearly sets out the type of document that can be described as SPG, and specifically states that it can take the form of site specific guidance such as master plans, design guides or area development briefs. In terms of the proper use of SPG and its relationship to planning policy, paragraph 5.4 of LDP Wales (2005) specifically states that SPG can play a useful role in supplementing plan policies and proposals, however, SPG should not be used to avoid subjecting plan policies and proposals to public scrutiny in accordance with statutory procedures. The paragraph also goes on to state that Plan policies should not attempt to delegate the criteria for decisions on planning applications to SPG. In the context of the above, it is clear that Criterion vi of Policy GP4 sets out a requirement for the provisions of the SPG to be adhered to. As such, the policy is contrary to the requirements of National Guidance with respect to the appropriate creation of local planning policy and therefore, Policy GP4 is contrary to Soundness Test C2. Suggested Change Criterion vi of Policy GP4 should be removed as it is unnecessary and contrary to National Guidance.	
15	15	Do you want to speak at Public Examination?	No

Item	Question	Soundness Test	Soundness Test
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
<i>Item Question</i>		<i>Tick-box reply</i>								
6 6	A new policy									Yes

136.D6//SP02 The Home Builders Federation Ltd 28/05/2012 E O M

Document: Deposit Plan, p.16

Policy: SP02

Summary: Unclear as to what the policy is trying to achieve in land use terms and how it will be implemented.

Item Question	Representation Text	Tick-box reply
2 2	Policy Number SP2	

7 7	A new paragraph or new text.	Yes
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14 14	Representation We do not understand the rationale behind this policy. It is difficult to understand what the policy is trying to achieve in land use terms or how it might be implemented. The policy needs more thorough explanation before readers can understand what it is trying to achieve, or indeed to commented on whether or not it is appropriate. In light of the abovem the policy contravenes Soundness Tests CE2 and CE3 and therefore should be removed.	
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15 15	Do you want to speak at Public Examination?	No
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Item Question	Soundness Test	Tick-box reply
1 1	I think the LDP is sound.	No

13 13	Test of Soundness CE2 and CE3	
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Item Question	Tick-box reply
6 6 A new policy	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
136.D7//SP06	The Home Builders Federation Ltd			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.19

Policy: SP06

Summary: Objection to the lack of evidence base behind the Green Belt allocation

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number	
	SP6	
7 7	A new paragraph or new text.	Yes
14 14	Representation	
	If the green belt has been extended then surely this should be evidence based. In view of the restrictions on development enforced through the Green Beld policies within the LDP, a though review of the green belt should be undertaken to ensure any extension is appropriate, before any changes are made to the designation	
	At present, the policy is not based on robust and credible evidence and therefore contravenes Soundness Test CE2.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness	
	CE2	
<i>Item Question</i>		<i>Tick-box reply</i>
6 6	A new policy	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
142.D1//H01	Farrow & Blease, Messrs	Alistair Jones Rural + Development		09/07/2012	<input type="checkbox"/>	P			M	
		Site: 211/142.C1 Claremont, Malpas (east of)								New Site

Policy: H01

Summary: Add new residential site at Claremont, Malpas

Item Question Representation Text

14 14 Representation

I am writing to inform you that Mr Derek Prosser has, for private reasons, resigned from the conduct of this matter. I have acted for many years for Messrs Farrow and Blease in respect of this land and also for the owners of the adjoining land, part of Brooklands Farm, Llantarnam, which lies in the Borough of Torfaen.

I should be grateful if all future correspondence in connection with the above matter could be sent to me at the above address and not to Mr Derek Prosser.

I understand that the land has not been allocated for residential development in the above deposit plan and for this reason should be grateful if you would accept this letter as formal objection to the plan.

I continue to believe that the land forms an attractive residential opportunity for Newport City Council. The site would provide variety of choice of location, is immediately available and could be accessed through adjoining land in the Council's ownership (which could be lucrative for the Council). Alternatively (or as well) the land could be accessed from the Torfaen land (subject to planning permission on the Torfaen land).

With the recent change of political control of the Council the new Council have an opportunity to secure the following advantages by allocating this site for residential development:-

1. Provision of variety of choice of location (the existing large allocations fail to do this).
2. Immediate availability (there is by contrast a considerable problem with delivery of existing sites).
3. The allocation of the site could benefit the Council financially with payment for access rights/sale of part of Council's adjoining land for residential development.
4. Early contribution towards affordable housing supply (existing sites are unlikely to be able to achieve this due to delivery problems).
5. The wildlife corridor and any other nature conservation issues would be protected/enhanced (including contribution to curing the existing pollution of the brook).
6. The allocation of the site in such a sustainable location coupled with 5.above would outweigh any other site protection
7. The allocation of the site for residential development would contribute towards the soundness of the plan for the reasons set out above. I would be pleased to meet with yourselves at an early date to discuss the merits of the site.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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144.D1//H01	Robert Hitchins Ltd			05/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.62

Site: 297/ Penylan Road

New Site

Policy: H01

Summary: Amend Policy H1 to add land at Pentrepoeth (site ref 65.C2)

Item Question Representation Text

2 2 Policy Number
H1

11 11 Site Name
Penylan Road, Pentrepoeth

12 12 Site Reference
144.C1

14 14 Representation

The strategy needs to be flexible enough to respond to changing circumstances and to include contingency approaches if the private sector are unable to deliver or the planned infrastructure can not be funded. Therefore for development to succeed a wide range and choice of sites is needed which are sustainably located and deliverable in the plan period such as land at Pentrepoeth.

Land at Pentrepoeth, incorporating land to the north (site ref 65.C2) would provide a sustainable extension to the settlement on a site which is deliverable and available and which would contribute to a 5 year supply of housing land. The Council has previously identified for residential development and the previous Inspector noted that there are no insurmountable barriers to the provision of a safe access and that it is a sustainable location.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2, CE4

Item Question

Tick-box reply

8 8 Add a new site.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
155.D1//CE05	Gwent Healthcare NHS Trust	Asbri Planning		09/07/2012	<input type="checkbox"/>	E	O		M	

Council Officer: LT

Site: 412/ St Cadoc's

Delete Site

Policy: CE05

Summary: Objection to the Environmental Space within the grounds of St Cadoc's Hospital.

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number CE2		
4	4	The Proposals Map		Yes
11	11	Site Name St Cadoc's Hospital		
14	14	Representation The allocation of land as Environmental Space within the grounds of St Cadocs Hospital under Deposit Plan Policy CE5 is objected to. The St Cadocs site will continue to provide health services, with related office accommodation for the foreseeable future and that much will depend on the timescale of the Llanfrechfa proposals and subsequent reviews of health provision. The recent planning application for the A & T Unit, which affects the area subject to open space proposals, demonstrates the extent to which there is need for flexibility in order to accommodate future health initiatives which may emerge. If future intentions are focused on health rather than housing development there will not be any need to safeguard open space. As such the continued identification of the western part of the site as subject to the 'environmental space' policy cannot be justified. Sufficient ancillary space exists in the form of large grassed areas which are spread throughout the site, as well as wooded belts. These function for the benefit of users of the site (employees, patients, service users, visitors). The enclosed covering submission letter also refers.		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To present evidence directly before the Inspector		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness CE1, CE4		
10	10	Delete an existing site.		

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
155.D3//H01.51	Gwent Healthcare NHS Trust	Asbri Planning		09/07/2012	<input type="checkbox"/>	E	O		M	

Council Officer: LT

Document: Deposit Plan, p.64

Site: 436/ Whiteheads Works

Delete Site

Policy: H01.51

Summary: Objection to residential site at former Whiteheads Works as part of the site may be required for healthcare purposes.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1 (51)	
4	4	The Proposals Map	Yes
11	11	Site Name Former Whiteheads Site	
12	12	Site Reference H1 (51)	
14	14	Representation The allocation of land for 400 dwellings on the former Whiteheads Works under Policy H1 (51) is objected to on the grounds that part, or all of the site, may be required for healthcare purposes within the Plan period. Furthermore objections are also made to the 400 dwelling numbers proposed on the Whiteheads site on the grounds that a proportion of the site will need to be retained for car parking to serve the Royal Gwent Hospital. As well as the need to consider future parking and other operational requirements, options for the future of the nearby Royal Gwent site are linked to the former Whiteheads land. These have included proposals for a new Newport Local General Hospital. Whilst the preferred way forward remains unresolved and is subject to a number of considerations, a sufficient degree of flexibility is required in order that any future health related developments could be accommodated on a site which, in terms of location offers the best option for complementary or replacement facilities for the Royal Gwent Hospital due to its proximity to the City Centre. Rather than a specific housing land allocation, therefore the site should be included within the urban boundary in order to allow for consideration of various uses, or a combination, which may emerge during the Plan period. The enclosed covering submission letter also refers.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination To present evidence directly before the Inspector.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

Tick-box reply

10 10 Delete an existing site.

155.D4//T1	Gwent Healthcare NHS Trust	Asbri Planning		09/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.82

Site: 413/ St Cadoc's

Delete Site

Policy: T1

Summary: Objection to new railway station within ground of St Cadocs Hospital as it is no longer relevant given that the previous UDP land allocation has been removed.

Item Question Representation Text

2 2 Policy Number
T1

4 4 The Proposals Map

Yes

11 11 Site Name
St Cadocs Hospital

14 14 Representation

The allocation of land for a new railway station within the grounds of St Cadocs Hospital under Deposit Plan Policy T1 is objected to, as it is no longer relevant given that the previous UDP housing land allocation has been removed.

While the site continues to be in operational health use the provision of the railway halt is unlikely, and would require proper consideration in the context of a future comprehensive scheme.

With the timing of future redevelopment proposals uncertain, the Council need to look at alternative locations along the railway corridor.

The enclosed covering submission letter also refers.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination
To present evidence directly before the Inspector.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE1, CE4

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
196.D1//SP22	Quarry Products Association			09/07/2012	<input type="checkbox"/>				M	

Policy: SP22

Summary: Amendment to Minerals Policy SP22

Item	Question	Representation Text
2	2	Policy Number SP22
3	3	Paragraph or section number(s) Para 2.91
14	14	Representation <p>Representations of the Mineral Products Association The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and readymixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar. Having reviewed the document we have the following comments to make MPA Comments</p> <p>Policy SP22 - MINERALS</p> <p>1. MPPW paragraph 17 states that authorities should include policies in their development plans for the maintenance throughout the plan period of landbanks for non-energy minerals which are currently in demand. References to 'landbank policy' occur again in this paragraph twice. This is a clear statement in national policy that references to landbank need to form part of a policy and by implication that it is not appropriate to merely relegate this to the supporting text or to a background paper. This is because the most fundamental reason for a local development plan for minerals is to provide for a steady and adequate supply of minerals and this can only be expressed in quanta. The plan is therefore unsound because it does not mention landbanks (and how this has influenced levels of provision) in the policy in accordance with national policy.</p> <p>2. We therefore seek the amendment of the plan as follows. (insertions in bold; deletions in strikethrough) THE PLAN WILL FULFIL ITS CONTRIBUTION TO THE REGIONAL DEMAND BY: (i) MAINTAINING AN ADEQUATE SUPPLY OF AGGREGATES IN THE FORM OF A MINIMUM LANDBANK (PERMITTED RESERVES) OF 10 YEARS FOR CRUSHED ROCK AGGREGATES AND A MINIMUM LANDBANK OF 7 YEARS FOR SAND AND GRAVEL THROUGHOUT THE PLAN PERIOD. (ii) CONSIDERING FAVOURABLY, THE PERMISSION OF UP TO 8-8.5 MILLION TONNES OF CRUSHED ROCK IN ACCORDANCE WITH THE RECOMMENDATIONS OF RTS, (iii) SAFEGUARDING LOCALISED POTENTIAL SAND AND GRAVEL RESOURCE BLOCKS; (iv) PROTECTING EXISTING AND POTENTIAL WHARVES AND EXISTING RAIL INFRASTRUCTURE AT NEWPORT DOCKS TO ENSURE THE CONTINUED SUSTAINABLE TRANSPORTATION OF AGGREGATE; (v) ENCOURAGING THE USE OF SECONDARY AND RECYCLED AGGREGATES WHERE APPROPRIATE; (vi) CONSIDERING PROPOSALS FOR THE WINNING AND WORKING OF MINERALS IN THE REGIONAL CONTEXT, WHILST HAVING CLEAR REGARD TO LOCAL FACTORS. This will provide the necessary alignment with national policy and regional technical guidance.</p> <p>3. It is good practice that the total mineral required for the period and the average annual rate of extraction required to reach it, would feature in the policy with an explanatory comment that there is currently no landbank and resources are limited. All of this information should form part of a landbank policy because all of it, including minimum landbanks, current landbanks, average extraction rates (where applicable) and total apportionment, are required for a local authority to make judgements on need and for developers to judge how they will justify their proposals. Key Diagram - para 2.91</p> <p>4. The Key Diagram contains a mistake that should be altered. It refers in the key to mineral reserves and to sand and gravel resources. The correct term should be "mineral resources". This is because reserves have all necessary permissions to work whilst resources are indicative of what might be present but have not been proved or have received permission to work.</p>
15	15	Do you want to speak at Public Examination? Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination All of it. (See full representation)									
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.				No					
13 13	Test of Soundness C2									

196.D2/SP22	Quarry Products Association			09/07/2012	<input type="checkbox"/>	E			M	
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Policy: SP22

Summary: Correction to key diagram

<i>Item Question</i>	<i>Representation Text</i>									
2 2	Policy Number SP22									
3 3	Paragraph or section number(s) Para 2.91									
14 14	Representation Key Diagram - para 2.91 4. The Key Diagram contains a mistake that should be altered. It refers in the key to mineral reserves and to sand and gravel resources. The correct term should be "mineral resources". This is because reserves have all necessary permissions to work whilst resources are indicative of what might be present but have not been proved or have received permission to work.									
15 15	Do you want to speak at Public Examination?				Yes					
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.				No					
13 13	Test of Soundness C2									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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207.D1//H01	Oak Court Estates (Langstone Mon) Ltd	Robertson Francis Partnership		09/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.62

Site: 306/ Oak Court

New Site

Policy: H01

Summary: Objection to Policy H1 and proposing new site at Oakcourt, Langstone

Item Question Representation Text

2 2 Policy Number
Housing

3 3 Paragraph or section number(s)
Several

4 4 The Proposals Map
To be amended to include the Oak Court Site

11 11 Site Name
Oak Court

12 12 Site Reference
Langstone

14 14 Representation
Rep. 207

- 1) A more robust assessment of housing land use economics should be prepared.
- 2) A complete review of housing land availability data to establish beyond reasonable doubt the realism or buildability of some of the sites scheduled and the sustainability of these.
- 3) A supplementary list of housing site availability stating where community benefits/disbenefits have been fully analysed.
- 4) The automatic deletion from housing site availability schedules all sites that have not progressed to construction stage within the previous ten years.

NOTE: See submission from MANGO PLANNING, which argues the information given herein.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
P1, C4, CE2, CE4

Item Question

Tick-box reply

8 8 Add a new site. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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207.D2//H01	Oak Court Estates (Langstone Mon) Ltd	Robertson Francis Partnership		09/07/2012	<input type="checkbox"/>	E	O		M	
		Additional material submitted		SA/SEA submitted						

Document: Deposit Plan, p.62

Site: 306/ Oak Court

New Site

Policy: H01

Summary: Change Policy H1 to include Oak Court site at Langstone

Item Question Representation Text

2 2 Policy Number
H1, SP10

11 11 Site Name
Oak Court, Langstone

12 12 Site Reference
40

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Representations on behalf of Oak Court Estates (Langstone Mon.) Ltd. to Newport Local Development Plan (LDP)-Deposit Draft 2011-2026 in respect of:

Proposed village centre and residential development at land between Catsash Road, the A48 and Halse Garden Centre, Langstone

On behalf of our client, Oak Court Estates, we formally request that the site detailed on the enclosed masterplan be considered for inclusion within the settlement boundary of Langstone and as a housing allocation (supporting a Village Centre) under Policy HI of the Deposit LDP.

Site description

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

Background

The enclosed plan sets out the extent of our client's land. The entire extent of our client's land was promoted for mixed use/ residential development during the preparation of the adopted UDP.

This site was promoted as a potential mixed-use scheme consisting of housing with a new village centre (comprising retail units, health centre, primary school and amenity space). Whilst the Inspector noted the merits of the site and raised no objection to the scheme in planning terms, the site was not taken forward as an allocation at that time due to perceived impact on the deliverability of housing at the former Llanwern Steelworks site.

The site boundary was then revised and the southern part of my client's site, as indicated on the enclosed plan, was put forward as a candidate site for mixed-use development (residential, employment, commercial) in this current emerging LDP.

This reduced site was dismissed by the local planning authority ("LPA") due to sustainability concerns over the release of greenfield land for development and the risk of prejudicing the preferred strategy of focusing new housing on the redevelopment of Llanwern steel works and the Eastern Expansion Area. This view was taken in the context of a (erroneous) view that there is adequate housing supply in Newport.

By failing to include this site within the LDP thus far, my client considers that the LPA has also missed a significant opportunity to

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

Accordingly, we are instructed to submit further representations to highlight the need for further reconsideration of the contribution that this site can make to meeting the housing and infrastructure needs of Langstone.

Potential use

This site presents a unique opportunity to plan comprehensively for the current and future development needs of the local community. Langstone is a village with a substantial built-up residential area, with high market demand for housing. However, it is very limited in terms of community facilities and lacks a 'Village Centre'.

Housing in Langstone has been developed in a piecemeal manner and none of the developments have provided the necessary community facilities to support such housing growth. This has led to the unsustainable development of the village over recent years, which has had negative impacts on the local community and has led to unsustainable travel patterns.

Representation Details

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The development plan should identify the growing needs of the local community and provide for them accordingly. Indeed, that is the very reason for having the development plan. Failure to give due consideration to these needs will lead either to the facilities being provided on an 'ad hoc' basis, without regard to wider strategic and sustainability requirements, or not at all.

The subject site represents a natural extension to the existing Settlement Boundary in Langstone, which follows the alignment of the A48 to the south and existing residential development to the east and west of the site. The inclusion of this site within the Settlement Boundary, as shown on the enclosed masterplan, would provide an infill development opportunity, linking the areas of existing residential development that flank the eastern and western boundaries of the subject site.

Whilst the site is greenfield, it is not considered to be open countryside but, effectively an in-fill opportunity. It is bordered closely on three sides by urban development and amounts simply to an open space at the fringe of, but certainly within, a continuous urban settlement. The A48 is a busy main road and the character and environment of this stretch is dominated by that development. This has a noticeable bearing on the character of the subject site itself.

The development of the site would satisfactorily round-off the built-up area of Langstone and complete the existing pattern development between Catsash Road and the garden centre.

The proposed development would comprise two key elements - Community facilities to anchor the village centre, and enabling residential development.

Community facilities

An extensive Council-led consultation with members of the local community to inform the LDP revealed their concerns over the lack of facilities for the village of Langstone, particularly community facilities such as shops and children's play areas. Langstone has no 'centre' and there are very few local shops. Most people travel to undertake their main food shopping at Newport Retail Park and in Newport city centre. Moreover, there are very few brownfield sites available within Langstone to provide these much-needed facilities. The need for new and improved community facilities for Langstone was also highlighted through recent consultations undertaken by the landowner with the Community Council, who voiced strong support for the development of the subject site for a Village Centre, to provide the much-needed facilities.

Langstone is notably deficient in facilities when compared to other villages within Newport County Borough. This is particularly evident in the Council's Settlement Boundary Methodology Paper (April 2012), a background study to inform the LDP. The village of Underwood to the south east benefits from local shops, a health centre, playing fields and a leisure centre, whilst the villages of Marshfield and Castleton in the west of the county benefit from public houses, local shops, post office, are creation ground, a garden centre, three areas of informal open space and a community centre.

Paragraph 9.1 of the LDP Deposit notes that "A key challenge is to ensure that all parts of the community, including rural areas, have effective access to services and community facilities" yet no sites have been designated for such purpose in Langstone.

The subject site represents a real opportunity to provide Langstone with a 'Village Centre' which, in response to the out come of consultation, could include facilities such as a local health centre, local shops (in particular a modest food store), community hall, a local pub, educational facilities and play areas. Policy SP12 of the Deposit LDP encourages the development of new community facilities. At a national level, the importance of access to community facilities is noted in Planning Policy Wales (4th Edition, February 2011) and the provision of new facilities is also encouraged.

Housing

Whilst it is envisaged that community facilities would lead the development of the site, new housing would also need to be incorporated as 'enabling development' so that the proposed community uses are viable.

The site could accommodate approximately 250 new dwellings of varying size and tenure (including affordable housing). Community consultation has highlighted a pressing local need for new housing, housing for the elderly and affordable housing. The proposed development would accommodate all three types of housing.

The reluctance to allocate the subject site for housing to-date has in part been as a consequence of the, in our view incorrect, assumption that Newport is able to provide the 5 year supply of housing sites required by national guidance in PPW and TANI. However, the Newport City Council Housing Background Paper (April 2012) shows a five year supply by the residual method of only 3.5 years, some 30% below the requirement.

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The LPA has justified this under-provision by reference to application of past build rates. However, these past rates have been suppressed by infrastructural restraints on housing development such as the river defences and the clearance works to Llanwern. The effect is therefore to seriously underplay the future needs for housing and the economic benefits that new housing development can bring.

Furthermore, the LPA's assessment has been based on assumptions regarding the delivery of housing at its two principal allocations, at Llanwern and the EEA. Neither site has proceeded at the rates anticipated and therefore there is a short to medium term 'gap' in provision to which no proper consideration has been given.

In this regard, the subject site is available for immediate development, has no constraints and is deliverable in the short term. It has the potential therefore to make a valuable contribution to the LDP's Growth Strategy both in terms of meeting the 5 year residual land requirement and meeting the short term shortfall in available sites that has arisen as a consequence of the delay in the release of the larger site at Llanwern and the EEA.

Against this background and the local need for new housing and affordable housing, the proposed residential development of part of the subject site should be welcomed and the site allocated accordingly.

Highways and accessibility

As the enclosed note from Traffic and Transport Planning highlights, the proposed development is well located to minimise car use and to encourage use of sustainable modes of transport. It can be accommodated within the local highway network without issue and will allow for improvements to access to the Langstone Primary School.

Landscape

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

Conclusions

The inclusion of the site within the settlement boundary and as a housing allocation in the LDP will deliver significant benefits in planning terms:

- 1.It will contribute towards meeting the 1.5 year short fall in housing land supply in Newport;
- 2.It will contribute towards meeting the short/medium term requirement for new housing in the County Borough;
- 3.It will meet the pressing open market and affordable housing needs of Langstone village itself, which could not be addressed by allocation of major sites to the south of the M4 within the Newport conurbation;
- 4.It will enable the provision of much-needed community facilities for Langstone, creating a more sustainable and self-contained community, reducing the need to travel to locations further a field to access alternative facilities.
5. It will ensure that Langstone fulfils its proper function as a village, through the provision of those facilities that its status in the settlement hierarchy demands; and
6. Create local employment, through both the construction phase of the development but also in the longer term.

These benefits may be secured without harm to interests of acknowledged importance.

We therefore request that this site is included within the settlement limit of Langstone and allocated in the Newport LDP for a new village centre and residential development.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination	

The proposed development is the subject of extensive consultation and will bring about significant benefits. Appearing at the hearing will allow for more detailed consideration of the background and benefits of the proposal.

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<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.								No	
13 13	Test of Soundness C1, C2, C4, CE1, CE2, CE4									
<i>Item Question</i>										
8 8	Add a new site.								Yes	

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208.D1//H16.03	RSPB			11/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

[Delete Site](#)

Policy: H16.03

Summary: Object to the allocation of Gypsy and Traveller accommodation at Pye Corner H16(iii)

Item Question *Representation Text*

2 2 Policy Number
 H16(iii) Pye Corner

Representation Details

by: Representation No

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14	14	Representation								
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Introduction:

The RSPB objects to the proposed allocation H16 (iii) Former Army Camp, Pye Corner, for the following planning reasons: -

1. The proposed allocation is located partly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.
2. CCW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.
3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts will be both direct and indirect.
4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.
5. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed after Newport's very large brownfield land resource.
6. To allocate this site would be contrary to the following: -
 - z. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs
 - aa. Section 42 of the NERC act, which sets out the Welsh Government, and the local planning authority, duties in respect of the UK BAP process with regards to the coastal grazing marsh habitat of acknowledged importance for biological diversity.
 - bb. Planning Policy Wales 2011, "LDP's Wales 2005", and TAN 5 (NatuConservation) 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.
 - cc. The Deposit Draft Local Development Plan, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK BAP and the LBAP process, replacement habitats, use of planning conditions and obligations, pollution and SEA/SA.
 - dd. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

Background :

The Gwent Levels:

The proposed allocation objected to by the RSPB fall partly within the Gwent Levels Sites of Special Scientific Interest, notified under S28 of the Wildlife and Countryside Act 1981 (as amended).

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

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Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

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

Direct:

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

Indirect:

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

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

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

Test of Soundness Rationale

C1The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition

C2The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs

C3The allocation does not have regard to the WSP, which sets out an environmentally sustainable vision for the Gwent Levels

P2The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them

National and Local Policy Context:

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

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

The following are section 28G authorities-

(a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;

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(b) The Welsh Government (hereafter referred to as the WG)

(c) A local authority;

Paragraph 45 of the Assembly's Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.

"New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." (emphasis added)

Para 5.4.3 of PPW states :-

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

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

- Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
- In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
- Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;
- That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved.

(emphasis added)

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

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

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

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

The RSPB is of the view that to not allocate this site would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty applies to the WG itself.

The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this,

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considers that the proposed allocation, would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

Test of SoundnessRationale

C2In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy)

The Newport Deposit Draft LDP:

Para 2.4.1 of PPW states :-

“National planning policies in Planning Policy Wales should not be repeated”

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Deposit Draft LDP, therefore please see below for an analysis of this issue

UK, Welsh and Newport Biodiversity Processes:

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

Test of SoundnessRationale

CE1The lack of a policy on Biodiversity and the biodiversity process frustrates the creation of a coherent strategy, because it renders this important habitat, of which Newport holds the largest resource in Wales, vulnerable to destructive development, exemplified by the allocation of this site.

The Sustainability Appraisal/Strategic Environmental Assessment Report SA/SEA:

The RSPB supports the following in the SA/SEA:

Sustainability themes linked to the final SA objectives:

“Planning should seek to ensure that development does not produce irreversible harmful effects”

Key Issues and Opportunities – Implications for the LDP“The LDP should ensure that new development seeks to enhance the quality of surface and groundwaters, and mitigate any potential direct and cumulative effects”

Sustainability Appraisal Framework – potential indicators“The LDP should contribute to the Welsh Government target 95% of national sites in favourable condition by 2015”

Assessment Rationale “The LDP options should seek to enhance designated and non-designated habitats and species”.

Assessment Rationale“The LDP should aim to protect the effective viability of protected sites through reference to their functional size and ecological connectivity”.

Assessment Rationale“The LDP options should seek to have a positive effect on maintaining and enhancing the quality of surface and ground waters”.

Strategic Policy Compatibility Assessment and Rationale “Policies should seek to enhance designated and non-designated sites”.

Analysis of Components (para 10.82)“Criterion (d) is unclear whether full mitigation or compensation would be acceptable”

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Planning Policy Wales 2011.
Sustainable Development and Planning Policy Wales 2011::

Paragraph 1.4.3 of Planning Policy Wales 2011 (hereafter referred to a PPW) states that the Welsh Government has a specific duty regarding sustainable development, namely that "it the (WG) promotes sustainable development", via the s79 of the Government of Wales Act 2006.

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

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

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

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

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-

"forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans"

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

The Environmental Element of Sustainable Development

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

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

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

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

Statutorily Designated Sites:

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

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

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

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

Para 5.2 of PPW further states that:-

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

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

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

Test of SoundnessRationale

C2By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites

Use of Mitigation and Compensation:

The Council attempts to surmount the environmental impacts arising from this proposed allocation is to cite the use of mitigation and compensation as legitimate means of overcoming such problems, and the use of planning conditions and obligations as a means of delivering mitigation and compensation.

Paragraph 3.7.1 (Planning Obligations) of PPW refers to the need to offset negative consequences of development.

Mitigation:

Annex A2 of SPG “Wildlife and Development” 2010 states :-

Applicants should ensure that they take account of all the potential effects of a development and make sure that avoidance and mitigation are appropriate to the situation”

In outlining the nature and severity of likely adverse impacts arising from the proposed allocation, the RSPB has shown that successful avoidance and mitigation are not possible and therefore not appropriate.

Compensation:

The RSPB considers that compensation has no place with regard to policies proposing to allocate sites on the Gwent Levels SSSI, because compensation is the last resort in the nature conservation hierarchy set out in Technical Advice Note 5, 2009.

Test of SoundnessRationale

CE1The plan is not coherent, because the criteria associated with the development of this proposed allocation cannot of this site

Use of Planning Conditions and Planning Obligations:

PPW (paragraph 4.6.1) states that conditions can enable a development proposed to proceed where it would otherwise be necessary to refuse planning permission. The RSPB is of the view that in the case of this proposed allocation, the imposition of conditions cannot fulfil this role, they cannot change the nature of the development to the extent where it would not otherwise be necessary to refuse permission.

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Paragraph 3.6.2 of PPW sets out in bullet point form the criteria which should be used in deciding when a condition should be imposed. Bullet Point 4 states that conditions should be enforceable. The RSPB considers that such conditions cannot be enforced and therefore cannot be imposed.

Test of SoundnessRationale

C1The local planning authority has not had regard to national planning policy (PPW) with regard to enforceability

Construction of Distribution Depot, Associated Trailer Parks and Car Parking, etc. Approved 6th August 1993

CCW did not recommend to the then Welsh Office that the call in the application be called-in, due to a commitment on the part of the developer to the highest environmental standards being conditioned on the application by the Newport County borough Council.

Post-construction monitoring in respect of this application showed that, in spite of he imposition of conditions :-

- All surveys conducted indicate a substantial impact on the reens as a result of the development.
- The ecosystems affected displayed different rates of recovery, or no recovery at all.
- The aquatic invertebrate communities identified in the baseline survey have shown a continued decline throughout the survey period.
- These loses in abundance and diversity were a result of the construction works.

Erection of 76,000 sq m Distribution Centre with Parking, Loading, Offices, etc. Approved 26th August 1999:

Post-construction monitoring showed that, in spite of the imposition of conditions:

- The site has failed to recover from a large discharge of sulphate during the early stages of the development and from other sources.
- High sulphate levels resulted in white and red algal blooms, and sulphur bacteria blooms in the reens on site, which in turn led to a reduction in the abundance and diversity of important invertebrate and plant species.
- High levels of other pollutants and poor water quality had also been recorded throughout the monitoring period.
- Sulphate levels in the balancing pond have stabilized at around 241 mg/l, far in excess of the 200 mg/l level deemed serious by CCW.
- pH levels remain consistently high and in excess of acceptable levels
- Since development ceased floral diversity has improved marginally in some reens, while in others it has decreased further.
- Very few rare or notable plant species have been recorded since development began.
- Only 2 notable aquatic/semi aquatic invertebrate species were found on site at the end of the monitoring period. And amongst the semi aquatic invertebrates there has been a substantial decrease in diversity.

Supplementary Planning Guidance "Wildlife and Development" 2010:

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

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

The RSPB considers that to delete this site would be in conformity with his obligation.

Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a :-

"Strong presumption against damaging development"

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As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount this strong presumption. The RSPB considers that it has failed to do so.

Paragraph 1.21 of "LDP's Wales 2006" states: -

"it is important that proposals are... likely to be implemented during the plan period".

Test of SoundnessRationale

CE1The local planning authority's approach to the allocation of this site is not coherent, because the site's development would be damaging and contrary to WG planning and wider public policy

Certainty and Deliverability:

PPW paragraph 2.1.7 states :-

"LDPs should give developers and the public certainty about the type of development that will be permitted at a given location" (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period.

Test of SoundnessRationale

C2In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty.

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government's duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI's and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

It would further be in conflict with established and widely recognised good planning practice in terms of environmental assessment, the resourceful use of land, and the use of supplementary planning guidance.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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RSPB Objection to H16(iii) I want to speak at the hearing session because the Proposed Allocation goes to the heart of the plan, making it fundamentally unsound. This merits a searching examination of the issues.

Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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C1, C2, C3, CE1, CE2. Individual trests are referred to in the main body of this representation.

Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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208.D2//EM01.01	RSPB			11/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.73

Site: 430/ Duffryn

[Delete Site](#)

Policy: EM01.01

Summary: Object to the Employment Site allocation at Duffryn EM1(i)

Item Question Representation Text

2 2 Policy Number
EM1 (i) Duffryn

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14 14 Representation

Introduction:

The RSPB takes a great interest in the Gwent Levels, because it is a nationally important site statutorily designated for its nature conservation interest, and Wales' largest coastal and floodplain grazing marsh – one of the top four of its type in the UK. We consider the Gwent Levels to be a nationally-important strategic biodiversity resource, and one which lends itself to a landscape-scale management approach, exemplified by the RSPB's "Futurescapes" approach.

The RSPB objects to the proposed allocation EM1 (i) (Duffryn), for the following planning reasons: -

1. The proposed allocation is located partly, or wholly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.
2. CCW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.
3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts would be both direct and indirect.
4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.
5. The local planning authority's claim that the above impacts can be satisfactorily mitigated through the use of planning conditions and planning obligations is not correct. Case studies in relation to development on the Gwent Levels shows that this approach has failed in the past because there are a number of indirect and direct adverse impacts which cannot be obviated or "designed away", and/or cannot be enforced, were conditions imposed or obligations signed. National planning guidance states that compensation is a last resort, and as the proposed allocation is not needed (see below).
6. There is no need for the proposed allocation. The LDP's employment land provision target can be attained without it. It is a very significant over-allocation
7. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed only after Newport's very large brownfield land resource. Notwithstanding the question referred to above, this would be several decades after the end of the plan period, which frustrates WG policy on the certainty and deliverability of LDPs.
8. To allocate this site would be contrary to the following: -
 - f. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs
 - g. Section 42 of the NERC Act, which sets out the Welsh Government, and the local planning authority duties in respect of the UK BAP process with regard to the coastal grazing marsh habitat of acknowledged importance for biological diversity.
 - h. Planning Policy Wales 2011, "LDP's Wales" 2005, and TAN 5 ("Nature Conservation and Planning") 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.
 - i. The Deposit Draft Local Development Plan itself, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK, Wales and Newport biodiversity processes, replacement habitats, use of planning conditions and obligations, employment, pollution and SEA/SA, brownfield land and certainty
 - j. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

It is instructive to note that the Inspector into the 2006 Newport UDP Public Inquiry, concluded, in relation to the same site, as follows :-

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Bearing in mind the requirement set out Section 28G in the Countryside and Rights of Way Act 2000 for the Council to take reasonable steps, consistent with the proper exercise of its functions to further the conservation and enhancement of the flora and fauna of this Site of Special Scientific Interest I would expect such a site to be allocated for development only if there was a need to do so. The Council has not demonstrated such a need. I agree, therefore with the amendment proposed by the Council which would emphasise the significance of the Site of Special Scientific Interest and the implications of the proposed M4 Relief Road.

Some added weight is given to this conclusion by the fact that the site is also floodplain and coastal grazing marsh, a priority habitat capable of supporting priority species. Section 74 of the Countryside and Rights of Way Act 2000 places a duty on public bodies in carrying out their functions to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Duffryn

To my mind the same arguments apply to the proposed allocation of 22ha of employment land at Duffryn (Policy ED1(i)), land that is within the St Brides Site of Special Scientific Interest.

The local planning authority has not provided any new evidence since 2006 to show a need for the site, nor carried out any research into the economic criteria which would be used to decide upon whether an application is of UK-national importance or not. This latter point is referred to in para 10.82 of the SA/SEA Report.

In respect of the amendment referred to by the Inspector, which the RSPB agreed with the Council, the absence of development proposals in respect of the site since 2006 shows that a new approach is now needed. The RSPB considers that the proposed allocation should be deleted, and that, if a developer wishes apply for consent for a development in this location, it should be dealt with through via the departure procedures outlined in para 3.12.1 et seq of PPW, and Welsh Office Circular 39/92.

The advantages of this approach are that it reduces uncertainty with regard to the environmentally sustainable management of the site, to further it's condition, as required by the Welsh Government target on SSSI condition. Please see below for more information in relation to this matter.

It is further instructive to note that para 10.82 of the SA/SEA Report (page 274) states that the previous iteration of the SA recommended that EM1 (ii) not be carried forward for development.

Background:

The Gwent Levels:

The proposed allocation objected to by the RSPB fall partly within the Gwent Levels Sites of Special Scientific Interest, notified under S28 of the Wildlife and Countryside Act 1981 (as amended). The Gwent levels SSSI comprises 6 component SSSIs, with allocation EM1(i) (Duffryn), falling partly within the St Brides SSSI,

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

Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

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

Direct:

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

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

Indirect:

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

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

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

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

Test of SoundnessRationale

C1The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition.

C2The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs.

C3The allocation does not have regard to the WSP, which sets out an environmentally sustainable vision for the Gwent Levels.

P2The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them.

National and Local Policy Context:

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

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

The following are section 28G authorities-

- (a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
- (b) The Welsh Government (hereafter referred to as the WG)
- (c) A local authority;

Paragraph 45 of the Assembly's Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.

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"New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." (emphasis added)

Para 5.4.3 of PPW states :-

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

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

- Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
- In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
- Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;
- If land-use allocations were to be pursued that were likely to cause damage to SSSIs (even with mitigation) that such damage could be fully justified i.e. it should clearly override the national importance of the SSSI and the Council had no less damaging alternative sites available to meet the identified need, and
- That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved.

(emphasis added)

It is the view of the RSPB that, by proposing this damaging allocation, the Council has not taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area. By for example by over-allocating employment land beyond that required to attain the Council's employment land provision targets (see below for more detail on this matter), it has failed to exclude potential allocations that would have adverse effects on SSSIs. It has failed to apply strict tests to any landuse allocations that could damage a SSSI , and has failed to show that adverse effects cannot be adequately mitigated or compensated for. It has thus failed to set out how, in its view, the proposed allocation clearly overrides the national importance of the SSSI (merely stating that they would be "prestige", and not providing any economic tests which would be used to decide whether or not an application is of UK-national importance), failed to identify need, and failed to show conclusively that it had no less damaging alternative sites.

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

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

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

The RSPB is of the view that to reject this proposed allocation would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty also applies to the WG itself.

The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this,

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and considers that the proposed allocation would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

Test of SoundnessRationale

C2In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy)

The Newport Deposit Draft LDP:

Para 2.4.1 of PPW states :-

"National planning policies in Planning Policy Wales should not be repeated"

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Deposit Draft LDP, therefore please see below for a discussion of this issue.

UK, Welsh and Newport Biodiversity Processes:

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

Test of SoundnessRationale

CE1The lack of a policy on Biodiversity and the biodiversity process frustrates the creation of a coherent strategy, because it renders this important habitat, of which Newport holds the largest resource in Wales, vulnerable to destructive development, exemplified by the allocation of this site.

The Sustainability Appraisal/Strategic Environmental Assessment Report SA/SEA:

The RSPB supports the following in the SA/SEA:

Sustainability themes linked to the final SA objectives:

"Planning should seek to ensure that development does not produce irreversible harmful effects".

Key Issues and Opportunities – Implications for the LDP"The LDP should ensure that new development seeks to enhance the quality of surface and groundwaters, and mitigate any potential direct and cumulative effects"

Sustainability Appraisal Framework – potential indicators"The LDP should contribute to the Welsh Government target 95% of national sites in favourable condition by 2015"

Assessment Rationale "The LDP options should seek to enhance designated and non-designated habitats and species"

Assessment Rationale"The LDP should aim to protect the effective viability of protected sites through reference to their functional size and ecological connectivity".

Assessment Rationale"The LDP options should seek to have a positive effect on maintaining and enhancing the quality of surface and ground waters"

Strategic Policy Compatibility Assessment and Rationale "Policies should seek to enhance designated and non-designated sites"

Analysis of Components (para 10.82)"Criterion (d) is unclear whether full mitigation or compensation would be acceptable"

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Analysis of Components (para 10.82)“the previous iteration of SA recommended that EM1(ii) not be carried forward for development”

Planning Policy Wales 2011.
Sustainable Development and Planning Policy Wales 2011::

Paragraph 1.4.3 of Planning Policy Wales 2011 states that the Welsh Government has a specific duty regarding sustainable development, namely that “it the (WG) promotes sustainable development” via the s79 of the Government of Wales Act 2006.

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

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

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

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

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-

“forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans”

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

The Environmental Element of Sustainable Development

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

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

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

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

Statutorily Designated Sites:

Paragraph 5.1.2 (Bullet Point3) states the WG’s objectives in relation to this matter include ensuring that statutorily designated sites are properly protected. It is the RSPB’s view that the Gwent Levels, as a statutorily designated site should be protected from damaging development.

Paragraph 5.3.2 states that regard should be had to the relative significance of international, national, and local designations when considering the weight to be attached to nature conservation

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interests. As the Gwent Levels SSSI is designated at the national level and therefore towards the top of the hierarchy, the RSPB is of the view that significant weight should be attached to this proposed allocation, which would have a material adverse impact upon them.

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

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

Para 5.2 of PPW further states that:-

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

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

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

Test of SoundnessRationale

C2By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites

Avoidance, Mitigation and compensation:

The Local Planning Authority attempts to surmount the issues of likely adverse impacts described above in two ways.

The first approach consists of a reliance on environmental impact assessment. Para 6.6. of the LDP states :-

“EIA Regulations will need to be complied with”

However, as in respect of the “prestigious uses” cited in paragraph 6.5, EIA would be in any event a legal requirement, this statement does nothing to resolve the issue of the insurmountability of the significant adverse impacts on the SSSI interest.

Furthermore, passing the problem “downstream” to the project (EIA) stage is very bad planning practice because the principle of the development of a site is established through its allocation in an adopted development plan. This principle cannot be overturned at the application stage, and therefore if there are insurmountable environmental problems associated with a proposed allocation, which cannot be removed by design or the use of conditions or obligations, it should not be allocated. The RSPB considers that such problems cannot be overcome, therefore this site should not be allocated.

Test of SoundnessRationale

C2The local planning authority has not had regard to national policy in the form of the EIA Regulations, as the latter should not be used to attempt to retroactively assess allocations. This is the role of SA/SEA

Use of Mitigation and Compensation:

The second method the Council employs in attempting to surmount the environmental impacts arising from this proposed allocation is to cite the use of mitigation and compensation as legitimate means of overcoming such problems, and the use of planning conditions and obligations as a means of delivering mitigation and compensation.

Paragraph 3.7.1 (Planning Obligations) of PPW refers to the need to offset negative consequences of development. Again, this is not possible in respect of proposed allocation EM1 (i)

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Mitigation:

Annex A2 of SPG "Wildlife and Development" 2010 states :-

Applicants should ensure that they take account of all the potential effects of a development and make sure that avoidance and mitigation are appropriate to the situation"

In outlining the nature and severity of likely adverse impacts arising from the proposed allocation, the RSPB has shown that successful avoidance and mitigation are not possible and therefore not appropriate.

Compensation:

The RSPB considers that compensation has no place in policy EM1, because compensation is the last resort in the hierarchy set out in Technical Advice Note 5, 2009.

As there is no need for the proposed allocation, it would cause significant adverse environmental effects as described above, and it would in any event be developed until after Newport's large brownfield resource is developed, the question of compensation does not arise, because the necessary preconditions for its proper consideration could not occur.

Test of SoundnessRationale

CE1The plan is not coherent, because the criteria associated with the development of this proposed allocation cannot of this site

Use of Planning Conditions and Planning Obligations:

PPW (paragraph 4.6.1) states that conditions can enable a development proposed to proceed where it would otherwise be necessary to refuse planning permission. The RSPB is of the view that in the case of this proposed allocation, the imposition of conditions cannot fulfil this role, because they cannot change the nature of the development to the extent where it would not otherwise be necessary to refuse permission.

Paragraph 3.6.2 of PPW sets out in bullet point form the criteria which should be used in deciding when a condition should be imposed. Bullet Point 4 states that conditions should be enforceable. The RSPB considers that such conditions cannot be enforced and therefore cannot be imposed.

Test of SoundnessRationale

C1The local planning authority has not had regard to national planning policy (PPW) with regard to enforceability

Past Use of Planning Conditions in Respect of Planning Applications on the Gwent Levels:

The RSPB's view that the use of planning conditions and obligations cannot remove adverse impacts on the SSSI interest is supported by a 2005 desk study, carried out by the Gwent Wildlife Trust, which examined the efficacy of conditions imposed in respect of some major planning applications on the Gwent Levels in Newport, looking at the results of post-construction monitoring.

Construction of Distribution Depot, Associated Trailer Parks and Car Parking, etc. Approved 6th August 1993

CCW did not recommend to the then Welsh Office that the call in the application be called-in, due to a commitment on the part of the developer to the highest environmental standards being conditioned on the application by the Newport County borough Council.

Post-construction monitoring in respect of this application showed that, in spite of the imposition of conditions :-

- All surveys conducted indicate a substantial impact on the reens as a result of the development.
- The ecosystems affected displayed different rates of recovery, or no recovery at all.
- The aquatic invertebrate communities identified in the baseline survey have shown a continued decline throughout the survey period.
- These losses in abundance and diversity were a result of the construction works.

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Erection of 76,000 sq m Distribution Centre with Parking, Loading, Offices, etc. Approved 26th August 1999:

Post-construction monitoring showed that, in spite of the imposition of conditions:

- The site failed to recover from a large discharge of sulphate during the early stages of the development and from other sources.
- High sulphate levels resulted in white and red algal blooms, and sulphur bacteria blooms in the reens on site, which in turn led to a reduction in the abundance and diversity of important invertebrate and plant species.
- High levels of other pollutants and poor water quality were recorded throughout the monitoring period.
- Sulphate levels in the balancing pond have stabilised at around 241 mg/l, far in excess of the 200 mg/l level deemed serious by CCW.
- pH levels remained consistently high and in excess of acceptable levels
- Since development ceased floral diversity improved marginally in some reens, while in others it decreased further.
- Very few rare or notable plant species have been recorded since development began.
- Only 2 notable aquatic/semi aquatic invertebrate species were found on site at the end of the monitoring period. And amongst the semi aquatic invertebrates there has been a substantial decrease in diversity.

Supplementary Planning Guidance "Wildlife and Development" 2010:

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

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

The RSPB considers that to delete this proposed allocation would be in conformity with his obligation.

Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a :-

"Strong presumption against damaging development"

As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount this strong presumption. The RSPB considers that it has failed to do so.

The Duffryn Phase 3 Masterplan:

Para 6.5 of the LDP refers to the Duffryn Phase 3 Masterplan. However, the RSPB considers that it is out of date, and was never adopted as supplementary planning guidance, and therefore should be disregarded.

The Masterplan was produced 14 years ago, in 1998. There have been of number of significant material changes in circumstance since the production of the Masterplan.

These include inter alia : -

- The NERC Act.

- Planning Policy Wales 2011: The Welsh Planning Guidance extant at the time of the production of the Duffryn Masterplan was Planning Guidance Wales 1996. A comparison of this document with the extant guidance set out in Planning Policy Wales 2011 shows that planning guidance in relation to nature conservation has changed fundamentally.

- The advent of the Welsh Government, its duty in relation to sustainable development and its own objectives in relation to nature conservation, and the role, powers and duties of the Welsh Government.

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- The CROW Act, especially s28G and s74.
- The advent of Habitat Action Plans (HAPs) pursuant of the UK Biodiversity process and of S42 of the NERC Act, and of the LBAP process.
- Increased duties for local planning authorities in respect of LDP formulation, in relation to biodiversity in general.
- The requirement to protect SSSIs from deterioration, with their important features conserved by appropriate management.
- The requirement for the carrying out of a Sustainability Appraisal and a Strategic Environmental Assessment of the development plan.
- TAN 5 2009
- The UKBAP process

Environmental and Sustainability Appraisal and the SEA Directive:

The Duffryn Phase 3 Masterplan was subjected neither to a sustainability appraisal nor a strategic environmental assessment pursuant of the SEA Directive 2004. The RSPB therefore considers that, that portion of the Duffryn area covered by the Masterplan has never been fully assessed from the point of view of the environment, sustainability, or nature conservation.

Planning Status of the Duffryn Masterplan

In addition to the above, the Masterplan was not adopted as supplementary planning guidance (SPG) as part of the development plan. Paragraph 2.12 of "LDP's Wales 2005" makes explicit the link between SPG and the development plan, citing SPG as a means of setting out more detailed guidance on the way in which the policies of the LDP will be applied in particular areas. The local planning authority admits this, referring to the Masterplan as "informal" (para 6.5). Even in the light of the above developments in modern planning thought since the production of the Masterplan, the Masterplan conceded that the development proposed in it would damage the SSSI interest, stating in paragraph 4.3.1 that only "examples" of "wildlife habitats" would be incorporated into the development.

Paragraph 4.3.8 of the Duffryn Masterplan refers to the need for tree planting. The RSPB considers that the shading effect of this will constitute a significant impact on the SSSI and coastal grazing marsh.

Thus, in conclusion, the RSPB is of the view that the Masterplan was an informal document, which did not carry the weight of being an adopted part of any development plan, and did not have the benefit of a formal consultation pursuant of the statutory development plan formulation process. It is now out of date and bears no relation to the way in which the modern planning system addresses biodiversity. Even taking the above into account, its still conceded that adverse impacts on the SSSI and Coastal and Floodplain Grazing Marsh would result from the development of the Duffryn area.

Test of SoundnessRationale

C2The local planning has not had regard to national planning policy because it treats the informal Duffryn Masterplan as if it were SPG, but the Masterplan has not been adopted pursuant to the criteria set down in PPW

Need:

The RSPB considers that the local planning authority has failed to show that the proposed allocation is needed to attain its employment land provision figures. This is important because, in the absence of the need for the proposed allocation, the Council cannot argue that "other material considerations (i.e. the need to allocate the site) outweigh the potential adverse environmental impacts". (PPW paragraph 5.5.2).

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Policy SP17 of the Deposit Draft LDP (Employment Land Requirement) sets out the methodology employed by the local planning authority to calculate the employment requirement. This is based on trend data and on projections of Newport's working-age population, and states that approximately 165 hectares of employment land will be provided for, for the plan period. The RSPB concurs with the methodology employed to arrive at this figure.

However, policy EM1 allocates a total of approximately 510 hectares. Thus EM1 (i) could be deleted from the LDP without having any impact whatsoever on its ability to attain its employment provision target. The allocation of EM1 is thus a very substantial over-allocation of some 320 hectares which would, at present take up rates of 11.4 hectares per year (described at paragraph 2.70 of the LDP as "appropriate") would take approximately 28 years to complete. Even this is an underestimate, given that an element of the additional approximately 469 hectares allocated in policy EM2 (Regeneration Sites) would also be employment land development. This is acknowledged in line 1 of policy EM1.

The local planning authority admits (Sue Hall pers comm.) that EM1 (i) and EM1 (ii) are not required to attain the LDP employment land provision target.).

In the light of the significant adverse impact on the UK-nationally important Gwent Levels SSSI and the UK, Wales and Newport Biodiversity process Priority Habitat Coastal and Floodplain Grazing Marsh set out else where in this representation which would be likely to arise as a result of the allocation of this site, the fact that it is not required adds weight to the RSPB's view that it should not be allocated.

The Brownfield Test:

Para 4.8.1 of PPW states :-

"Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high ecological value"

The SSSI designation, and UK, Wales and Newport Biodiversity Priority Habitat classification of the Gwent Levels shows that they are of high ecological value, and the fact that there is no need for the proposed allocation shows that it is possible to use brownfield land in preference.

Policy SP4 of the Deposit Draft LDP (criterion (ii) states :-

(ii) THE REUSE OF PREVIOUSLY DEVELOPED LAND ... IN PREFERENCE TO GREENFIELD SITES WHERE POSSIBLE"

The RSPB supports this policy, and furthermore believes that with the largest brownfield resource in Wales, it is possible to act in conformity with it.

As stated above, approx 28 years would elapse after the end of the plan period before EM1(i) would be developed. Paragraph 1.21 of "LDP's Wales 2006" states: -

"it is important that proposals are... likely to be implemented during the plan period".

The RSPB considers that, given that there is no need for EM1 (i), and that pursuit of para 4.8.1 would result in it being developed last, this proposed allocation is not in conformity with PPW and LDPs Wales.

This view is given added weight by the fact that the site has been allocated in previous development plans for many years without being developed, even during periods of rapid economic growth in Newport. Given that Wales is suffering its worst economic downturn for several decades, even disregarding the insurmountable environmental constraints associated with the site, the RSPB considers that it is extremely unlikely to be required during the plan period.

Test of SoundnessRationale

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CE1The local planning authority's approach to the allocation of this site is not coherent, because the site is not needed, and its development would be damaging and contrary to WG planning and wider public policy.

Certainty and Deliverability:

PPW paragraph 2.1.7 states :-

"LDPs should give developers and the public certainty about the type of development that will be permitted at a given location" (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period. This certainty requirement is further frustrated by the very restrictive criteria set out in criteria a. to d. of Policy EM1

Whilst it is acknowledged that the wording employed in policy EM1 is very similar to that agreed with the RSPB in respect of UDP Policy ED1during the 2006 Public Inquiry, the fact that EM1 (i) has still not been developed after many years of being allocated (see above) constitutes a major material change of circumstances, requiring a new approach.

The RSPB believes that the proposed allocation should be deleted, and that, if a developer wishes apply for consent for a development in this location, it should be dealt with via the departure procedures outlined in para 3.12.1 et seq of PPW, and Welsh Office Circular 39/92.

Advantages of this Approach: The advantage of this approach is that it reduces uncertainty and environmental blight relating to land at this location, and facilitates the environmentally-sustainable management of the SSSI to further its condition, as required by the WG target on SSSI condition. This approach does not preclude a developer from submitting a planning application in respect of the site, and departure procedures allow him to construct a case to the effect that his development proposal is in conformity with national and Newport planning policy.

Test of SoundnessRationale

C2In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government's duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI's and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

It would further be in conflict with established and widely recognised good planning practice in terms of environmental assessment, the resourceful use of land, and the use of supplementary planning guidance.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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RSPB Objection to EM1(i). I want to speak at the hearing session because the Proposed Allocation goes to the heart of theplan, making it fundamentally unsound. This merits a searching examination of the issues.

Item	Question	Soundness Test	
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1	1	I think the LDP is sound.	No
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13 13	Test of Soundness									
	C1, C2, C3, CE1, CE2. Individual tests are referred to in the main body of this representation.									
<i>Item Question</i>	<i>Tick-box reply</i>									
10 10	Delete an existing site.								Yes	

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208.D3//SP16	RSPB			11/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27

Site: 429/ Duffryn Link Road

[Delete Site](#)

Policy: SP16

Summary: Object to the allocation of western extension to the Southern Distributor Road

Item Question Representation Text

2 2 Policy Number

Western Extension to the Southern Distributor Road Policy SP16(iii)

Representation Details

by: Representation No

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14 14 Representation

Introduction:

The RSPB objects to the proposed allocation SP16 (iii) Western Extension to the Southern Distributor Road at Duffryn, for the following planning reasons: -

1. The proposed allocation is located partly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.
2. CCW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.
3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts will be both direct and indirect.
4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.
5. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed after Newport's very large brownfield land resource.
6. To allocate this site would be contrary to the following: -
 - u. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs
 - v. Section 42 of the NERC act, which sets out the Welsh Government, and the local planning authority, duties in respect of the UK BAP process with regards to the coastal grazing marsh habitat of acknowledged importance for biological diversity.
 - w. Planning Policy Wales 2011, "LDP's Wales 2005", and TAN 5 (Nature Conservation) 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.
 - x. The Deposit Draft Local Development Plan, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK BAP and the LBAP process, replacement habitats, use of planning conditions and obligations, pollution and SEA/SA.
 - y. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

Background :

The Gwent Levels:

The proposed allocation objected to by the RSPB fall partly within the Gwent Levels Sites of Special Scientific Interest, notified under S28 of the Wildlife and Countryside Act 1981 (as amended).

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

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Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

Para 2.61 of the Deposit Draft LDP underplays the likely adverse impact on the SSSI, by implying that it will "cross" one ree only. This is not the case, and all reens are part of the notified interest of the SSSI. It will not be possible to mitigate for or design away this adverse impact.

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

Direct:

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

Indirect:

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

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

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

Test of Soundness Rationale

C1The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition

C2The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs

C3The allocation does not have regard to the WSP, which sets out an environmentally sustainable vision for the Gwent Levels

P2The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them

Need and Certainty:

The RSPB considers that to allocate this site for the construction of a highway would be premature, because its development forms only one of four options currently being consulted upon by the Welsh Government as part of its "M4 Corridor Enhancement Measures" consultation.

The RSPB believes that this site should not be allocated until after the strategy for relieving congestion around the M4 corridor in the vicinity of Newport has been decided upon. This will take place in

Representation Details

Newport City Council Local Development Plan

by: Representation No

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2013, after the Minister has consulted on his draft strategy, following the current consultation.

National and Local Policy Context:

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

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

The following are section 28G authorities-

- (a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
- (b) The Welsh Government (hereafter referred to as the WG)
- (c) A local authority;

Paragraph 45 of the Assembly's Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.

"New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." (emphasis added)

Para 5.4.3 of PPW states :-

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

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

- Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
- In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
- Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;
- That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved.

(emphasis added)

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

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

Representation Details

Newport City Council Local Development Plan

by: Representation No

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

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

The RSPB is of the view that to not allocate this site would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty applies to the WG itself.

The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this, considers that the proposed allocation, would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

Test of SoundnessRationale

C2In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy)

The Newport Deposit Draft LDP:

Para 2.4.1 of PPW states :-

"National planning policies in Planning Policy Wales should not be repeated"

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Deposit Draft LDP, therefore please see below for an analysis of this issue

UK, Welsh and Newport Biodiversity Processes:

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

Test of SoundnessRationale

CE1The lack of a policy on Biodiversity and the biodiversity process frustrates the creation of a coherent strategy, because it renders this important habitat, of which Newport holds the largest resource in Wales, vulnerable to destructive development, exemplified by the allocation of this site.

The Sustainability Appraisal/Strategic Environmental Assessment Report SA/SEA:

The RSPB supports the following in the SA/SEA:

Sustainability themes linked to the final SA objectives:

"Planning should seek to ensure that development does not produce irreversible harmful effects"

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Key Issues and Opportunities – Implications for the LDP
The LDP should ensure that new development seeks to enhance the quality of surface and groundwaters, and mitigate any potential direct and cumulative effects

Sustainability Appraisal Framework – potential indicators
The LDP should contribute to the Welsh Government target 95% of national sites in favourable condition by 2015

Assessment Rationale
The LDP options should seek to enhance designated and non-designated habitats and species.

Assessment Rationale
The LDP should aim to protect the effective viability of protected sites through reference to their functional size and ecological connectivity.

Assessment Rationale
The LDP options should seek to have a positive effect on maintaining and enhancing the quality of surface and ground waters.

Strategic Policy Compatibility Assessment and Rationale
Policies should seek to enhance designated and non-designated sites.

Analysis of Components (para 10.82)
“Criterion (d) is unclear whether full mitigation or compensation would be acceptable”

Planning Policy Wales 2011.
Sustainable Development and Planning Policy Wales 2011::

Paragraph 1.4.3 of Planning Policy Wales 2011 (hereafter referred to a PPW) states that the Welsh Government has a specific duty regarding sustainable development, namely that “it the (WG) promotes sustainable development”, via the s79 of the Government of Wales Act 2006.

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

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

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

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

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-

“forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans”

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

The Environmental Element of Sustainable Development

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

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

Paragraph 4.4.2 (Bullet Point 7) cites planning as a key policy tool contributing to the protection and improvement of the environment so as to protect local and global ecosystems. In particular planning

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should "seek to ensure that development does not produce irreversible harmful effects on the natural environment". Bullet Point 7 further cites as an objective the conservation and enhancement of statutorily designated sites and the conservation of biodiversity.

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

Statutorily Designated Sites:

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

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

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

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

Para 5.2 of PPW further states that:-

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

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

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

Test of Soundness Rationale

C2By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites

Use of Mitigation and Compensation:

The Council attempts to surmount the environmental impacts arising from this proposed allocation is to cite the use of mitigation and compensation as legitimate means of overcoming such problems, and the use of planning conditions and obligations as a means of delivering mitigation and compensation.

Paragraph 3.7.1 (Planning Obligations) of PPW refers to the need to offset negative consequences of development.

Mitigation:

Annex A2 of SPG "Wildlife and Development" 2010 states :-

Applicants should ensure that they take account of all the potential effects of a development and make sure that avoidance and mitigation are appropriate to the situation"

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In outlining the nature and severity of likely adverse impacts arising from the proposed allocation, the RSPB has shown that successful avoidance and mitigation are not possible and therefore not appropriate.

Compensation:

The RSPB considers that compensation has no place with regard to policies proposing to allocate sites on the Gwent Levels SSSI, because compensation is the last resort in the nature conservation hierarchy set out in Technical Advice Note 5, 2009.

Test of SoundnessRationale

CE1The plan is not coherent, because the criteria associated with the development of this proposed allocation cannot of this site

Use of Planning Conditions and Planning Obligations:

PPW (paragraph 4.6.1) states that conditions can enable a development proposed to proceed where it would otherwise be necessary to refuse planning permission. The RSPB is of the view that in the case of this proposed allocation, the imposition of conditions cannot fulfil this role, they cannot change the nature of the development to the extent where it would not otherwise be necessary to refuse permission.

Paragraph 3.6.2 of PPW sets out in bullet point form the criteria which should be used in deciding when a condition should be imposed. Bullet Point 4 states that conditions should be enforceable. The RSPB considers that such conditions cannot be enforced and therefore cannot be imposed.

Test of SoundnessRationale

C1The local planning authority has not had regard to national planning policy (PPW) with regard to enforceability

Construction of Distribution Depot, Associated Trailer Parks and Car Parking, etc. Approved 6th August 1993

CCW did not recommend to the then Welsh Office that the call in the application be called-in, due to a commitment on the part of the developer to the highest environmental standards being conditioned on the application by the Newport County borough Council.

Post-construction monitoring in respect of this application showed that, in spite of the imposition of conditions :-

- All surveys conducted indicate a substantial impact on the reens as a result of the development.
- The ecosystems affected displayed different rates of recovery, or no recovery at all.
- The aquatic invertebrate communities identified in the baseline survey have shown a continued decline throughout the survey period.
- These losses in abundance and diversity were a result of the construction works.

Erection of 76,000 sq m Distribution Centre with Parking, Loading, Offices, etc. Approved 26th August 1999:

Post-construction monitoring showed that, in spite of the imposition of conditions:

- The site has failed to recover from a large discharge of sulphate during the early stages of the development and from other sources.
- High sulphate levels resulted in white and red algal blooms, and sulphur bacteria blooms in the reens on site, which in turn led to a reduction in the abundance and diversity of important invertebrate and plant species.
- High levels of other pollutants and poor water quality had also been recorded throughout the monitoring period.
- Sulphate levels in the balancing pond have stabilized at around 241 mg/l, far in excess of the 200 mg/l level deemed serious by CCW.
- pH levels remain consistently high and in excess of acceptable levels

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- Since development ceased floral diversity has improved marginally in some reens, while in others it has decreased further.
- Very few rare or notable plant species have been recorded since development began.
- Only 2 notable aquatic/semi aquatic invertebrate species were found on site at the end of the monitoring period. And amongst the semi aquatic invertebrates there has been a substantial decrease in diversity.

Supplementary Planning Guidance "Wildlife and Development" 2010:

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

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

The RSPB considers that to delete this site would be in conformity with his obligation.

Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a :-

"Strong presumption against damaging development"

As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount thi strong presumption. The RSPB considers that it has failed to do so.

Paragraph 1.21 of "LDP's Wales 2006" states: -

"it is important that proposals are... likely to be implemented during the plan period".

Test of SoundnessRationale

CE1The local planning authority's approach to the allocation of this site is not coherent, because the site's development would be damaging and contrary to WG planning and wider public policy

Certainty and Deliverability:

PPW paragraph 2.1.7 states :-

"LDPs should give developers and the public certainty about the type of development that will be permitted at a given location" (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period.

Test of SoundnessRationale

C2In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty.

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government's duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI's and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

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It would further be in conflict with established and widely recognised good planning practice in terms of environmental assessment, the resourceful use of land, and the use of supplementary planning guidance.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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I want to speak at the hearing in respect of AP16(ii) because this issue goes to the heart of the plan and makes it fundamentally unsound. I therefore feel that a searching examination of the issues is required.

Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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Item Question

Tick-box reply

10	10	Delete an existing site.								Yes
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208.D4//CF15	RSPB			11/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.108

Site: 432/ Percoed Lane School Site

[Delete Site](#)

Policy: CF15

Summary: Object to the allocation of Percoed Reen School Site

Item Question Representation Text

2	2	Policy Number
		CF15(iii) Percoed Reen School

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14	14	Representation								
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Introduction:

The RSPB objects to the proposed allocation CF15 (i) (South of Percoed Reen, Duffryn), for the following planning reasons: -

1. The proposed allocation are located partly, or wholly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.
2. CCW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.
3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts will be both direct and indirect.
4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.
5. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed after Newport's very large brownfield land resource. Notwithstanding the question of referred to above, this would be several decades after the end of the plan period, which frustrates WG policy on the certainty and deliverability of LDPs.
6. To allocate this site would be contrary to the following: -
 - p. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs
 - q. Section 42 of the NERC act, which sets out the Welsh Government, and the local planning authority, duties in respect of the UK BAP process with regards to the coastal grazing marsh habitat of acknowledged importance for biological diversity.
 - r. Planning Policy Wales 2011, "LDP's Wales 2005", and TAN 5 (Nature Conservation) 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.
 - s. The Deposit Draft Local Development Plan, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK BAP and the LBAP process, replacement habitats, use of planning conditions and obligations, pollution and SEA/SA.
 - t. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

Background :

The Gwent Levels:

The proposed allocation objected to by the RSPB fall partly within the Gwent Levels Sites of Special Scientific Interest, notified under S28 of the Wildlife and Countryside Act 1981 (as amended).

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

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Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

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

Direct:

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

Indirect:

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

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

Blocking of Management of Coastal and Floodplain Grazing Marsh (UK, Wales and Newport Priority Habitat) and Reeds (SSSI): In the interests of health and safety, access to the reeds and Coastal and Floodplain Grazing Marsh on the part of the machinery which is required for their sustainable management would be blocked.

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

Test of SoundnessRationale

C1The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition

C2The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs

C3The allocation does not have regard to the WSP, which sets out an environmentally sustainable vision for the Gwent Levels

P2The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them

National and Local Policy Context:

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

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

The following are section 28G authorities-

- (a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
- (b) The Welsh Government (hereafter referred to as the WG)
- (c) A local authority;

Paragraph 45 of the Assembly's Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.

"New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." (emphasis added)

Para 5.4.3 of PPW states :-

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

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

- Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
- In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
- Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;
- If land-use allocations were to be pursued that were likely to cause damage to SSSIs (even with mitigation) that such damage could be fully justified i.e. it should clearly override the national importance of the SSSI and the Council had no less damaging alternative sites available to meet the identified need, and
- That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved.

(emphasis added)

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

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

Over and above its designation of an SSSI, the site of the proposed allocation consists of Coastal and Floodplain Grazing Marsh, which is a Priority Habitat under the UK and Welsh Biodiversity

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

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

The RSPB is of the view that to reject this proposed allocation would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty applies to the WG itself.

The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this, considers that the proposed allocation, would result in eutrophication. The RSPB concurs with the HAP that urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

Test of SoundnessRationale

C2In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy)

The Newport Deposit Draft LDP:

Para 2.4.1 of PPW states :-

"National planning policies in Planning Policy Wales should not be repeated"

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Deposit Draft LDP, therefore please see below for an analysis of this issue

Policy CF15:

The text of Policy CF15 is deficient, because it does not provide certainty as to the location of a Welsh-medium primary school. Indeed, it appears from the text that the local planning authority is itself uncertain as to where the school will be located. This is not in conformity with the need for the LDP to deliver certainty, as set out below. The RSPB is therefore of the view that CF15 (i) should be deleted. If and when a new Welsh medium school is required, a site for it should be brought forward at the 5 yearly review stage of the LDP, and the need for it monitored as part of the AMR process.

Para 5.58 is deficient, because it does not identify that proposed allocation CF15 (i) is located on a SSSI.

UK, Welsh and Newport Biodiversity Processes:

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

Test of SoundnessRationale

CE1The lack of a policy on Biodiversity and the biodiversity process frustrates the creation of a coherent strategy, because it renders this important habitat, of which Newport holds the largest resource in Wales, vulnerable to destructive development, exemplified by the allocation of this site.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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The Sustainability Appraisal/Strategic Environmental Assessment Report SA/SEA:

The RSPB supports the following in the SA/SEA:

Sustainability themes linked to the final SA objectives:

"Planning should seek to ensure that development does not produce irreversible harmful effects"

Key Issues and Opportunities – Implications for the LDP
The LDP should ensure that new development seeks to enhance the quality of surface and groundwaters, and mitigate any potential direct and cumulative effects

Sustainability Appraisal Framework – potential indicators
The LDP should contribute to the Welsh Government target 95% of national sites in favourable condition by 2015

Assessment Rationale
The LDP options should seek to enhance designated and non-designated habitats and species

Assessment Rationale
The LDP should aim to protect the effective viability of protected sites through reference to their functional size and ecological connectivity.

Assessment Rationale
The LDP options should seek to have a positive effect on maintaining and enhancing the quality of surface and ground waters

Strategic Policy Compatibility Assessment and Rationale
Policies should seek to enhance designated and non-designated sites

Analysis of Components (para 10.82)
"Criterion (d) is unclear whether full mitigation or compensation would be acceptable"

Planning Policy Wales 2011.

Sustainable Development and Planning Policy Wales 2011::

Paragraph 1.4.3 of Planning Policy Wales 2011 (hereafter referred to a PPW) states that the Welsh Government has a specific duty regarding sustainable development, namely that "it the (WG) promotes sustainable development", via the s79 of the Government of Wales Act 2006.

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

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

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

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

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-

"forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans"

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

The Environmental Element of Sustainable Development

Representation Details

by: Representation No

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

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

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

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

Statutorily Designated Sites:

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

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

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

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

Para 5.2 of PPW further states that:-

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

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

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

Test of Soundness Rationale

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

Avoidance, Mitigation and compensation:

The Local Planning Authority attempts to surmount the issues of likely adverse impacts described above in two ways.

The first approach consists of a reliance on environmental impact assessment. Para 6.6. of the LDP states :-

"EIA Regulations will need to be complied with"

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However, EIA would be in any event a legal requirement, this statement does nothing to resolve the issue of the insurmountability of the significant adverse impacts on the SSSI interest.

Furthermore, passing the problem "downstream" to the project (EIA) stage is very bad planning practice because the principle of the development of a site is established through its allocation in an adopted development plan. This principle cannot be overturned at the application stage, and therefore if there are insurmountable environmental problems associated with a proposed allocation, which cannot be removed by design or the use of conditions or obligations it should not be allocated. The RSPB considers that such problems cannot be overcome, therefore this site should not be allocated.

Test of SoundnessRationale

C2The local planning authority has not had regard to national policy in the form of the EIA Regulations, as the latter should not be used to attempt to retroactively assess allocations. This is the role of SA/SEA

Use of Mitigation and Compensation:

The second method the Council employs in attempting to surmount the environmental impacts arising from this proposed allocation is to cite the use of mitigation and compensation as legitimate means of overcoming such problems, and the use of planning conditions and obligations as a means of delivering mitigation and compensation.

Paragraph 3.7.1 (Planning Obligations) of PPW refers to the need to offset negative consequences of development.

Mitigation:

Annex A2 of SPG "Wildlife and Development" 2010 states :-

Applicants should ensure that they take account of all the potential effects of a development and make sure that avoidance and mitigation are appropriate to the situation"

In outlining the nature and severity of likely adverse impacts arising from the proposed allocation, the RSPB has shown that successful avoidance and mitigation are not possible and therefore not appropriate.

Compensation:

The RSPB considers that compensation has no place with regard to policies proposing to allocate sites on the Gwent Levels SSSI, because compensation is the last resort in the nature conservation hierarchy set out in Technical Advice Note 5, 2009.

As there is no need for the proposed allocation, it would cause significant adverse environmental effects as described above, and it would in any event be developed after Newport's large brownfield resource is developed, the question of compensation does not arise, because the necessary preconditions for its proper consideration could not occur.

Test of SoundnessRationale

CE1The plan is not coherent, because the criteria associated with the development of this proposed allocation cannot of this site

Use of Planning Conditions and Planning Obligations:

PPW (paragraph 4.6.1) states that conditions can enable a development proposed to proceed where it would otherwise be necessary to refuse planning permission. The RSPB is of the view that in the case of this proposed allocation, the imposition of conditions cannot fulfil this role, they cannot change the nature of the development to the extent where it would not otherwise be necessary to refuse permission.

Paragraph 3.6.2 of PPW sets out in bullet point form the criteria which should be used in deciding when a condition should be imposed. Bullet Point 4 states that conditions should be enforceable. The RSPB considers that such conditions cannot be enforced and therefore cannot be imposed.

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Test of SoundnessRationale

C1The local planning authority has not had regard to national planning policy (PPW) with regard to enforceability

Past Use of Planning Conditions in Respect of Planning Applications on the Gwent Levels:

The RSPB's view that the use of planning conditions and obligations cannot remove adverse impacts on the SSSI interest is supported by a 2005 desk study, carried out by the Gwent Wildlife Trust, which examined the efficacy of conditions imposed in respect of some major planning applications on the Gwent Levels in Newport, looking at the results of post-construction monitoring.

Construction of Distribution Depot, Associated Trailer Parks and Car Parking, etc. Approved 6th August 1993

CCW did not recommend to the then Welsh Office that the call in the application be called-in, due to a commitment on the part of the developer to the highest environmental standards being conditioned on the application by the Newport County borough Council.

Post-construction monitoring in respect of this application showed that, in spite of the imposition of conditions :-

- All surveys conducted indicate a substantial impact on the reens as a result of the development.
- The ecosystems affected displayed different rates of recovery, or no recovery at all.
- The aquatic invertebrate communities identified in the baseline survey have shown a continued decline throughout the survey period.
- These losses in abundance and diversity were a result of the construction works.

Erection of 76,000 sq m Distribution Centre with Parking, Loading, Offices, etc. Approved 26th August 1999:

Post-construction monitoring showed that, in spite of the imposition of conditions:

- The site has failed to recover from a large discharge of sulphate during the early stages of the development and from other sources.
- High sulphate levels resulted in white and red algal blooms, and sulphur bacteria blooms in the reens on site, which in turn led to a reduction in the abundance and diversity of important invertebrate and plant species.
- High levels of other pollutants and poor water quality had also been recorded throughout the monitoring period.
- Sulphate levels in the balancing pond have stabilized at around 241 mg/l, far in excess of the 200 mg/l level deemed serious by CCW.
- pH levels remain consistently high and in excess of acceptable levels
- Since development ceased floral diversity has improved marginally in some reens, while in others it has decreased further.
- Very few rare or notable plant species have been recorded since development began.
- Only 2 notable aquatic/semi aquatic invertebrate species were found on site at the end of the monitoring period. And amongst the semi aquatic invertebrates there has been a substantial decrease in diversity.

Supplementary Planning Guidance "Wildlife and Development" 2010:

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

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

The RSPB considers that to delete this site would be in conformity with his obligation.

Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a :-

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“Strong presumption against damaging development”

As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount thi strong presumption. The RSPB considers that it has failed to do so.

The Brownfield Test:

Para 4.8.1 of PPW states :-

“Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high ecological value”

The SSSI designation, and UK, Wales and Newport Biodiversity Priority Habitat classification of the Gwent Levels shows that they are of high ecological value, and the fact that there is no need for the proposed allocation shows that it is possible to use brownfield land in preference.

Policy SP4 of the Deposit Draft LDP (criterion (ii) states :-

(ii) THE REUSE OF PREVIOUSLY DEVELOPED LAND ... IN PREFERENCE TO GREENFIELD SITES WHERE POSSIBLE”

The RSPB supports this policy, and furthermore believes that with the largest brownfield resource in Wales, it is possible to act in conformity with it.

Paragraph 1.21 of “LDP’s Wales 2006” states: -

“it is important that proposals are... likely to be implemented during the plan period”.

Test of SoundnessRationale

CE1The local planning authority’s approach to the allocation of this site is not coherent, because the site’s development would be damaging and contrary to WG planning and wider public policy

Certainty and Deliverability:

PPW paragraph 2.1.7 states :-

“LDPs should give developers and the public certainty about the type of development that will be permitted at a given location” (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period.

Test of SoundnessRationale

C2In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty.

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government’s duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI’s and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

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Document: Deposit Plan, p.74

Site: 427/ Gwent Europark

[Delete Site](#)

Policy: EM01.06

Summary: Object to the inclusion of Employment Site allocation Gwent Europark

Item Question *Representation Text*

2 2 Policy Number

EM1 (vi) Gwent Europark

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14	14	Representation								
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Introduction:

The RSPB objects to the proposed allocation EM1 (iv) Gwent Europark, for the following planning reasons: -

1. The proposed allocation are located partly, or wholly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.
2. CCW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.
3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts will be both direct and indirect.
4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.
5. The local planning authority's claim that the above impacts can be satisfactorily mitigated through the use of planning conditions and planning obligations is not correct. Case studies in relation to development on the Gwent Levels shows that this approach has failed in the past because there are a number of indirect and direct adverse impacts which cannot be obviated or "designed away", and/or cannot be enforced, were conditions imposed or obligations signed.
6. There is no need for the proposed allocation. The LDP's employment land provision target can be attained without it. It is a very significant over-allocation
7. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed after Newport's very large brownfield land resource. Notwithstanding the question of referred to above, this would be several decades after the end of the plan period, which frustrates WG policy on the certainty and deliverability of LDPs.
8. To allocate this site would be contrary to the following: -
 - k. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs
 - l. Section 42 of the NERC act, which sets out the Welsh Government, and the local planning authority, duties in respect of the UK BAP process with regards to the coastal grazing marsh habitat of acknowledged importance for biological diversity.
 - m. Planning Policy Wales 2011, "LDP's Wales 2005", and TAN 5 (Nature Conservation) 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.
 - n. The Deposit Draft Local Development Plan, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK BAP and the LBAP process, replacement habitats, use of planning conditions and obligations, employment, pollution and SEA/SA.
 - o. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

Background :

The Gwent Levels:

The proposed allocation objected to by the RSPB fall partly within the Gwent Levels Sites of Special Scientific Interest, notified under S28 of the Wildlife and Countryside Act 1981 (as amended).

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

Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

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

Direct:

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

Indirect:

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

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

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

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

Test of SoundnessRationale

C1The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition

C2The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs

C3The allocation does not have regard to the WSP, which sets out an environmentally sustainable vision for the Gwent Levels

P2The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in th site being proposed fro allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them

Representation Details

Newport City Council Local Development Plan

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National and Local Policy Context:

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

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

The following are section 28G authorities-

- (a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
- (b) The Welsh Government (hereafter referred to as the WG)
- (c) A local authority;

Paragraph 45 of the Assembly's Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.

"New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." [emphasis added]

Para 5.4.3 of PPW states :-

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

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

- Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
- In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
- Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;
- If land-use allocations were to be pursued that were likely to cause damage to SSSIs (even with mitigation) that such damage could be fully justified i.e. it should clearly override the national importance of the SSSI and the Council had no less damaging alternative sites available to meet the identified need, and
- That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved.

(emphasis added)

It is the view of the RSPB that, by proposing this damaging allocation, the Council has not taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area. By for example by over-allocating employment land beyond that required to attain the Council's employment land provision targets (see below for more detail on this matter), it has failed to exclude potential allocations that would have adverse effects on SSSIs. It has failed to apply strict tests to any landuse allocations that could damage a SSSI, and has failed to show that adverse effects cannot be adequately mitigated or compensated for. It has thus failed to set out how, in its view, the proposed allocation clearly override the national importance of the SSSI (merely stating that they would be "prestige", and not providing any economic tests which would be used to decide whether or not an application is of UK-national importance), failed to identify need, and failed to show conclusively that it had no less damaging alternative sites. It has furthermore failed to provide appropriate habitat compensation to ensure that the interest of the SSSI network was conserved

Representation Details

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

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

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

The RSPB is of the view that to reject this proposed allocation would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty applies to the WG itself.

The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this, considers that the proposed allocation, would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

Test of SoundnessRationale

C2In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy)

The Newport Deposit Draft LDP:

Para 2.4.1 of PPW states :-

“National planning policies in Planning Policy Wales should not be repeated”

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Deposit Draft LDP, therefore please see below for an analysis of this issue

UK, Welsh and Newport Biodiversity Processes:

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

Test of SoundnessRationale

CE1The lack of a policy on Biodiversity and the biodiversity process frustrates the creation of a coherent strategy, because it renders this important habitat, of which Newport holds the largest resource in Wales, vulnerable to destructive development, exemplified by the allocation of this site.

The Sustainability Appraisal/Strategic Environmental Assessment Report SA/SEA:

The RSPB supports the following in the SA/SEA:

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Newport City Council Local Development Plan

by: Representation No

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Sustainability themes linked to the final SA objectives:
"Planning should seek to ensure that development does not produce irreversible harmful effects"

Key Issues and Opportunities – Implications for the LDPTThe LDP should ensure that new development seeks to enhance the quality of surface and groundwaters, and mitigate any potential direct and cumulative effects

Sustainability Appraisal Framework – potential indicatorsThe LDP should contribute to the Welsh Government target 95% of national sites in favourable condition by 2015

Assessment Rationale The LDP options should seek to enhance designated and non-designated habitats and species

Assessment RationaleThe LDP should aim to protect the effective viability of protected sites through reference to their functional size and ecological connectivity.

Assessment RationaleThe LDP options should seek to have a positive effect on maintaining and enhancing the quality of surface and ground waters

Strategic Policy Compatibility Assessment and Rationale Policies should seek to enhance designated and non-designated sites

Analysis of Components (para 10.82)"Criterion (d) is unclear whether full mitigation or compensation would be acceptable"

Planning Policy Wales 2011.

Sustainable Development and Planning Policy Wales 2011::

Paragraph 1.4.3 of Planning Policy Wales 2011 (hereafter referred to a PPW) states that the Welsh Government has a specific duty regarding sustainable development, namely that "it the (WG) promotes sustainable development", via the s79 of the Government of Wales Act 2006.

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

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

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

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

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-

"forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans"

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

The Environmental Element of Sustainable Development

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

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

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

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

Statutorily Designated Sites:

Paragraph 5.1.2 (Bullet Point3) states the WG's objectives in relation to this matter include ensuring that statutorily designated sites are properly protected. It is the RSPB's view that the Gwent Levels, as a statutorily designated site should be protected from damaging development.

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

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

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

Para 5.2 of PPW further states that:-

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

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

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

Test of SoundnessRationale

C2By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites

Avoidance, Mitigation and compensation:

The Local Planning Authority attempts to surmount the issues of likely adverse impacts described above in two ways.

The first approach consists of a reliance on environmental impact assessment. Para 6.6. of the LDP states :-

"EIA Regulations will need to be complied with"

However, EIA would be in any event a legal requirement, this statement does nothing to resolve the issue of the insurmountability of the significant adverse impacts on the SSSI interest.

Furthermore, passing the problem "downstream" to the project (EIA) stage is very bad planning practice because the principle of the development of a site is established through its allocation in an adopted development plan. This principle cannot be overturned at the application stage, and therefore if there are insurmountable environmental problems associated with a proposed allocation, which cannot be removed by design or the use of conditions or obligations it should not be allocated. The RSPB considers that such problems cannot be overcome, therefore this site should not be allocated.

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Test of SoundnessRationale

C2The local planning authority has not had regard to national policy in the form of the EIA Regulations, as the latter should not be used to attempt to retroactively assess allocations. This is the role of SA/SEA

Use of Mitigation and Compensation:

The second method the Council employs in attempting to surmount the environmental impacts arising from this proposed allocation is to cite the use of mitigation and compensation as legitimate means of overcoming such problems, and the use of planning conditions and obligations as a means of delivering mitigation and compensation.

Paragraph 3.7.1 (Planning Obligations) of PPW refers to the need to offset negative consequences of development. Again, this is not possible in respect of proposed allocation EM1 (vi)

Mitigation:

Annex A2 of SPG "Wildlife and Development" 2010 states :-

Applicants should ensure that they take account of all the potential effects of a development and make sure that avoidance and mitigation are appropriate to the situation"

In outlining the nature and severity of likely adverse impacts arising from the proposed allocation, the RSPB has shown that successful avoidance and mitigation are not possible and therefore not appropriate.

Compensation:

The RSPB considers that compensation has no place in policy EM1, because compensation is the last resort in the nature conservation hierarchy set out in Technical Advice Note 5, 2009.

As there is no need for the proposed allocation, it would cause significant adverse environmental effects as described above, and it would in any event be developed after Newport's large brownfield resource is developed, the question of compensation does not arise, because the necessary preconditions for its proper consideration could not occur.

Test of SoundnessRationale

CE1The plan is not coherent, because the criteria associated with the development of this proposed allocation cannot of this site

Use of Planning Conditions and Planning Obligations:

PPW (paragraph 4.6.1) states that conditions can enable a development proposed to proceed where it would otherwise be necessary to refuse planning permission. The RSPB is of the view that in the case of this proposed allocation, the imposition of conditions cannot fulfil this role, they cannot change the nature of the development to the extent where it would not otherwise be necessary to refuse permission.

Paragraph 3.6.2 of PPW sets out in bullet point form the criteria which should be used in deciding when a condition should be imposed. Bullet Point 4 states that conditions should be enforceable. The RSPB considers that such conditions cannot be enforced and therefore cannot be imposed.

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Test of SoundnessRationale

C1The local planning authority has not had regard to national planning policy (PPW) with regard to enforceability

Past Use of Planning Conditions in Respect of Planning Applications on the Gwent Levels:

The RSPB's view that the use of planning conditions and obligations cannot remove adverse impacts on the SSSI interest is supported by a 2005 desk study, carried out by the Gwent Wildlife Trust, which examined the efficacy of conditions imposed in respect of some major planning applications on the Gwent Levels in Newport, looking at the results of post-construction monitoring.

Construction of Distribution Depot, Associated Trailer Parks and Car Parking, etc. Approved 6th August 1993

CCW did not recommend to the then Welsh Office that the call in the application be called-in, due to a commitment on the part of the developer to the highest environmental standards being conditioned on the application by the Newport County borough Council.

Post-construction monitoring in respect of this application showed that, in spite of the imposition of conditions :-

- All surveys conducted indicate a substantial impact on the reens as a result of the development.
- The ecosystems affected displayed different rates of recovery, or no recovery at all.
- The aquatic invertebrate communities identified in the baseline survey have shown a continued decline throughout the survey period.
- These losses in abundance and diversity were a result of the construction works.

Erection of 76,000 sq m Distribution Centre with Parking, Loading, Offices, etc. Approved 26th August 1999:

Post-construction monitoring showed that, in spite of the imposition of conditions:

- The site has failed to recover from a large discharge of sulphate during the early stages of the development and from other sources.
- High sulphate levels resulted in white and red algal blooms, and sulphur bacteria blooms in the reens on site, which in turn led to a reduction in the abundance and diversity of important invertebrate and plant species.
- High levels of other pollutants and poor water quality had also been recorded throughout the monitoring period.
- Sulphate levels in the balancing pond have stabilized at around 241 mg/l, far in excess of the 200 mg/l level deemed serious by CCW.
- pH levels remain consistently high and in excess of acceptable levels
- Since development ceased floral diversity has improved marginally in some reens, while in others it has decreased further.
- Very few rare or notable plant species have been recorded since development began.
- Only 2 notable aquatic/semi aquatic invertebrate species were found on site at the end of the monitoring period. And amongst the semi aquatic invertebrates there has been a substantial decrease in diversity.

Supplementary Planning Guidance "Wildlife and Development" 2010:

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

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

The RSPB considers that to delete this site would be in conformity with his obligation.

Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a :-

"Strong presumption against damaging development"

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As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount thi strong presumption. The RSPB considers that it has failed to do so.

The Brownfield Test:

Para 4.8.1 of PPW states :-

“Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high ecological value”

The SSSI designation, and UK, Wales and Newport Biodiversity Priority Habitat classification of the Gwent Levels shows that they are of high ecological value, and the fact that there is no need for the proposed allocation shows that it is possible to use brownfield land in preference.

Policy SP4 of the Deposit Draft LDP (criterion (ii) states :-

(ii) THE REUSE OF PREVIOUSLY DEVELOPED LAND ... IN PREFERENCE TO GREENFIELD SITES WHERE POSSIBLE”

The RSPB supports this policy, and furthermore believes that with the largest brownfield resource in Wales, it is possible to act in conformity with it.

Newport has the largest brownfield resource in Wales, complying with para 4.8.1 of PPW results in this brownfield resource being developed first, and EM1 (vi) last. Paragraph 1.21 of “LDP’s Wales 2006” states: -

“it is important that proposals are... likely to be implemented during the plan period”.

Test of SoundnessRationale

CE1The local planning authority’s approach to the allocation of this site is not coherent, because the site is not needed, and its development would be damaging and contrary to WG planning and wider public policy

Certainty and Deliverability:

PPW paragraph 2.1.7 states :-

“LDPs should give developers and the public certainty about the type of development that will be permitted at a given location” (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period.

Test of SoundnessRationale

C2In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government’s duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI’s and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

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Document: Deposit Plan, p.74

Site: 417/ East of Queensway Meadows

[Delete Site](#)

Policy: EM01.02

Summary: Object to the allocation of Employment Site at East of Queensway Meadows, South of Glan Llyn

Item Question *Representation Text*

2 2 Policy Number

EM1 (ii) East of Queensway Meadows, South of Glanllyn

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14 14 Representation

Introduction: The RSPB takes a great interest in the Gwent Levels, because it is a nationally important site statutorily designated for its nature conservation interest, and Wales' largest coastal and floodplain grazing marsh – one of the top four of its type in the UK. We consider the Gwent Levels to be a nationally-important strategic biodiversity resource, and one which lends itself to a landscape-scale management approach, exemplified by the RSPB's "Futurescapes" approach.

The RSPB objects to the proposed allocation EM1 (ii) (East of Queensway Meadows, south of Glanllyn), for the following planning reasons: -

1. The proposed allocation is located partly, or wholly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.
2. CCW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.
3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts would be both direct and indirect.
4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.
5. The local planning authority's claim that the above impacts can be satisfactorily mitigated through the use of planning conditions and planning obligations is not correct. Case studies in relation to development on the Gwent Levels shows that this approach has failed in the past because there are a number of indirect and direct adverse impacts which cannot be obviated or "designed away", and/or cannot be enforced, were conditions imposed or obligations signed. National planning guidance states that compensation is a last resort, and as the proposed allocation is not needed (see below) questions of compensation should not arise
6. There is no need for the proposed allocation. The LDP's employment land provision target can be attained without it. It is a very significant over-allocation
7. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed only after Newport's very large brownfield land resource. Notwithstanding the question referred to above, this would be several decades after the end of the plan period, which frustrates WG policy on the certainty and deliverability of LDPs.
8. To allocate this site would be contrary to the following: -
 - a. Section 28G of the NERC Act, which sets out the duties of the local planning authority, and the Welsh Government, with regard to the protection and enhancement of SSSIs
 - b. Section 42 of the NERC Act, which sets out the Welsh Government, and the local planning authority duties in respect of the UK BAP process with regard to the coastal grazing marsh habitat of acknowledged importance for biological diversity.
 - c. Planning Policy Wales 2011, "LDP's Wales" 2005, and TAN 5 ("Nature Conservation and Planning") 2009, which set out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK, Wales and Newport biodiversity processes, pollution, certainty and planning conditions and obligations.
 - d. The Deposit Draft Local Development Plan itself, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK BAP and the LBAP process, replacement habitats, use of planning conditions and obligations, employment, pollution and SEA/SA, brownfield and certainty.
 - e. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

It is instructive to note that the Inspector into the 2006 Newport UDP Public Inquiry, concluded, in relation to the same site, as follows :-

Bearing in mind the requirement set out Section 28G in the Countryside and

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Rights of Way Act 2000 for the Council to take reasonable steps, consistent with the proper exercise of its functions to further the conservation and enhancement of the flora and fauna of this Site of Special Scientific Interest I would expect such a site to be allocated for development only if there was a need to do so. The Council has not demonstrated such a need. I agree, therefore with the amendment proposed by the Council which would emphasise the significance of the Site of Special Scientific Interest.

Some added weight is given to this conclusion by the fact that the site is also floodplain and coastal grazing marsh, a priority habitat capable of supporting priority species. Section 74 of the Countryside and Rights of Way Act 2000 places a duty on public bodies in carrying out their functions to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

The local planning authority has not provided any new evidence since 2006 to show a need for the site, nor carried out any research into the economic criteria which would be used to decide upon whether an application is of UK-national importance or not. This latter point is referred to in para 10.82 of the SA/SEA Report.

In respect of the amendment referred to by the Inspector, which the RSPB agreed with the Council, the absence of development proposals in respect of the site since 2006 shows that a new approach is now needed. The RSPB considers that the proposed allocation should be deleted, and that, if a developer wishes apply for consent for a development in this location, it should be dealt with through via the departure procedures outlined in para 3.12.1 et seq of PPW, and Welsh Office Circular 39/92.

The advantages of this approach are that it reduces uncertainty with regard to the environmentally sustainable management of the site, to further it's condition, as required by the Welsh Government target on SSSI condition. Please see below for more information in relation to this matter.

It is further instructive to note that para 10.82 of the SA/SEA Report (page 274) states that the previous iteration of the SA recommended that EM1 (ii) not be carried forward for development.

Background :

The Gwent Levels:

The proposed allocation objected to by the RSPB fall partly within the Gwent Levels Sites of Special Scientific Interest, notified under S28 of the Wildlife and Countryside Act 1981 (as amended). The Gwent levels SSSI comprises 6 component SSSIs.

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

Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

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

Direct:

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

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Indirect:

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

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

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

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

Test of Soundness Rationale

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

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

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

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

National and Local Policy Context:

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

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

The following are section 28G authorities-

- (a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
- (b) The Welsh Government (hereafter referred to as the WG)
- (c) A local authority;

Paragraph 45 of the Assembly's Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.

"New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." (emphasis added)

Para 5.4.3 of PPW states :-

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

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

- Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
- In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
- Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;
- If land-use allocations were to be pursued that were likely to cause damage to SSSIs (even with mitigation) that such damage could be fully justified i.e. it should clearly override the national importance of the SSSI and the Council had no less damaging alternative sites available to meet the identified need, and
- That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved.

(emphases added)

It is the view of the RSPB that, by proposing this damaging allocation, the Council has not taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area. By for example by over-allocating employment land beyond that required to attain the Council's employment land provision targets (see below for more detail on this matter), it has failed to exclude potential allocations that would have adverse effects on SSSIs. It has failed to apply strict tests to any landuse allocations that could damage a SSSI , and has failed to show that adverse effects cannot be adequately mitigated or compensated for. It has thus failed to set out how, in its view, the proposed allocation clearly overrides the national importance of the SSSI (merely stating that they would be "prestige", and not providing any economic tests which would be used to decide whether or not an application is of UK-national importance), failed to identify need, and failed to show conclusively that it had no less damaging alternative sites.

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

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

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

The RSPB is of the view that to reject this proposed allocation would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty also applies to the WG itself.

The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this,

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and considers that the proposed allocation would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

Test of SoundnessRationale

C2In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy)

The Newport Deposit Draft LDP:

Para 2.4.1 of PPW states :-

"National planning policies in Planning Policy Wales should not be repeated"

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Deposit Draft LDP, therefore please see below for an discussion of this issue.

UK, Welsh and Newport Biodiversity Processes:

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

Test of SoundnessRationale

CE1The lack of a policy on biodiversity and the biodiversity process frustrates the creation of a coherent strategy, because it renders this important habitat, of which Newport holds the largest resource in Wales, vulnerable to destructive development, exemplified by the allocation of this site.

The Sustainability Appraisal/Strategic Environmental Assessment Report SA/SEA:

The RSPB supports the following in the SA/SEA:

Sustainability themes linked to the final SA objectives:

"Planning should seek to ensure that development does not produce irreversible harmful effects"

Key Issues and Opportunities – Implications for the LDP"The LDP should ensure that new development seeks to enhance the quality of surface and groundwaters, and mitigate any potential direct and cumulative effects"

Sustainability Appraisal Framework – potential indicators"The LDP should contribute to the Welsh Government target 95% of national sites in favourable condition by 2015"

Assessment Rationale "The LDP options should seek to enhance designated and non-designated habitats and species"

Assessment Rationale"The LDP should aim to protect the effective viability of protected sites through reference to their functional size and ecological connectivity"

Assessment Rationale"The LDP options should seek to have a positive effect on maintaining and enhancing the quality of surface and ground waters"

Strategic Policy Compatibility Assessment and Rationale "Policies should seek to enhance designated and non-designated sites"

Analysis of Components (para 10.82)"Criterion (d) is unclear whether full mitigation or compensation would be acceptable"

Analysis of Components (para 10.82)"The previous iteration of SA recommended that EM1(ii) not be carried forward for development"

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Planning Policy Wales 2011.
Sustainable Development and Planning Policy Wales 2011::

Paragraph 1.4.3 of Planning Policy Wales 2011 states that the Welsh Government has a specific duty regarding sustainable development, namely that “it the (WG) promotes sustainable development” via the s79 of the Government of Wales Act 2006.

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

It is the thus the view of the RSPB that the WG duty in relation to sustainable development set out in the Government of Wales Act 2006 must be addressed through inter alia the town and country planning system in Wales, and that to approve this proposed allocation which would have a material adverse impact on statutorily designated sites of national nature conservation importance and a UK Biodiversity Priority Habitat would be counter to sustainable development, and thus to the Government of Wales Act 2006.

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

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

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-

“forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans”

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

The Environmental Element of Sustainable Development

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

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

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

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

Statutorily Designated Sites:

Paragraph 5.1.2 (Bullet Point3) states the WG’s objectives in relation to this matter include ensuring that statutorily designated sites are properly protected. It is the RSPB’s view that the Gwent Levels, as a statutorily designated site should be protected from damaging development.

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

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

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

Para 5.2 of PPW further states that:-

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

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

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

Test of SoundnessRationale

C2By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites

Avoidance, Mitigation and compensation:

The Local Planning Authority attempts to surmount the issues of likely adverse impacts described above in two ways.

The first approach consists of a reliance on environmental impact assessment. Para 6.6. of the LDP states :-

"EIA Regulations will need to be complied with"

However, as in respect of the "prestigious uses" cited in paragraph 6.5, EIA would be in any event a legal requirement, this statement does nothing to resolve the issue of the insurmountability of the significant adverse impacts on the SSSI interest.

Furthermore, passing the problem "downstream" to the project (EIA) stage is very bad planning practice because the principle of the development of a site is established through its allocation in an adopted development plan. This principle cannot be overturned at the application stage, and therefore if there are insurmountable environmental problems associated with a proposed allocation, which cannot be removed by design or the use of conditions or obligations, it should not be allocated. The RSPB considers that such problems cannot be overcome, therefore this site should not be allocated.

Test of SoundnessRationale

C2The local planning authority has not had regard to national policy in the form of the EIA Regulations, as the latter should not be used to attempt to retroactively assess allocations. This is the role of SA/SEA

Use of Mitigation and Compensation:

The second method the Council employs in attempting to surmount the environmental impacts arising from this proposed allocation is to cite the use of mitigation and compensation as legitimate means of overcoming such problems, and the use of planning conditions and obligations as a means of delivering mitigation and compensation.

Paragraph 3.7.1 (Planning Obligations) of PPW refers to the need to offset negative consequences of development. Again, this is not possible in respect of proposed allocation EM1 (ii)

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Mitigation:

Annex A2 of SPG "Wildlife and Development" 2010 states :-

Applicants should ensure that they take account of all the potential effects of a development and make sure that avoidance and mitigation are appropriate to the situation"

In outlining the nature and severity of likely adverse impacts arising from the proposed allocation, the RSPB has shown that successful avoidance and mitigation are not possible and therefore not appropriate.

Compensation:

The RSPB considers that compensation has no place in policy EM1, because compensation is the last resort in the hierarchy set out in Technical Advice Note 5, 2009.

As there is no need for the proposed allocation, it would cause significant adverse environmental effects as described above, and it would in any event be developed until after Newport's large brownfield resource is developed, the question of compensation does not arise, because the necessary preconditions for its proper consideration could not occur.

Test of SoundnessRationale

CE1The plan is not coherent, because the criteria associated with the development of this proposed allocation cannot of this site

Use of Planning Conditions and Planning Obligations:

PPW (paragraph 4.6.1) states that conditions can enable a development proposed to proceed where it would otherwise be necessary to refuse planning permission. The RSPB is of the view that in the case of this proposed allocation, the imposition of conditions cannot fulfil this role, because they cannot change the nature of the development to the extent where it would not otherwise be necessary to refuse permission.

Paragraph 3.6.2 of PPW sets out in bullet point form the criteria which should be used in deciding when a condition should be imposed. Bullet Point 4 states that conditions should be enforceable. The RSPB considers that such conditions cannot be enforced and therefore cannot be imposed.

Test of SoundnessRationale

C1The local planning authority has not had regard to national planning policy (PPW) with regard to enforceability

Past Use of Planning Conditions in Respect of Planning Applications on the Gwent Levels:

The RSPB's view that the use of planning conditions and obligations cannot remove adverse impacts on the SSSI interest is supported by a 2005 desk study, carried out by the Gwent Wildlife Trust, which examined the efficacy of conditions imposed in respect of some major planning applications on the Gwent Levels in Newport, looking at the results of post-construction monitoring.

Construction of Distribution Depot, Associated Trailer Parks and Car Parking, etc. Approved 6th August 1993

CCW did not recommend to the then Welsh Office that the call in the application be called-in, due to a commitment on the part of the developer to the highest environmental standards being conditioned on the application by the Newport County borough Council.

Post-construction monitoring in respect of this application showed that, in spite of the imposition of conditions :-

- All surveys conducted indicate a substantial impact on the reens as a result of the development.
- The ecosystems affected displayed different rates of recovery, or no recovery at all.
- The aquatic invertebrate communities identified in the baseline survey have shown a continued decline throughout the survey period.

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•These losses in abundance and diversity were a result of the construction works.

Erection of 76,000 sq m Distribution Centre with Parking, Loading, Offices, etc. Approved 26th August 1999:

Post-construction monitoring showed that, in spite of the imposition of conditions:

- The site failed to recover from a large discharge of sulphate during the early stages of the development and from other sources.
- High sulphate levels resulted in white and red algal blooms, and sulphur bacteria blooms in the reens on site, which in turn led to a reduction in the abundance and diversity of important invertebrate and plant species.
- High levels of other pollutants and poor water quality were recorded throughout the monitoring period.
- Sulphate levels in the balancing pond have stabilised at around 241 mg/l, far in excess of the 200 mg/l level deemed serious by CCW.
- pH levels remained consistently high and in excess of acceptable levels
- Since development ceased floral diversity improved marginally in some reens, while in others it decreased further.
- Very few rare or notable plant species have been recorded since development began.
- Only 2 notable aquatic/semi aquatic invertebrate species were found on site at the end of the monitoring period. And amongst the semi aquatic invertebrates there has been a substantial decrease in diversity.

Supplementary Planning Guidance "Wildlife and Development" 2010:

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

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

The RSPB considers that to delete this proposed allocation would be in conformity with his obligation.

Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a :-

"Strong presumption against damaging development"

As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount this strong presumption. The RSPB considers that it has failed to do so.

Need:

The RSPB considers that the local planning authority has failed to show that the proposed allocation is needed to attain its employment land provision figures. This is important because, in the absence of the need for the proposed allocation, the Council cannot argue that "other material considerations (i.e. the need to allocate the site) outweigh the potential adverse environmental impacts". (PPW paragraph 5.5.2).

Policy SP17 of the Deposit Draft LDP (Employment Land Requirement) sets out the methodology employed by the local planning authority to calculate the employment requirement. This is based on trend data and on projections of Newport's working-age population, and states that approximately 165 hectares of employment land will be provided for, for the plan period. The RSPB concurs with the methodology employed to arrive at this figure.

However, policy EM1 allocates a total of approximately 510 hectares. Thus EM1 (ii) could be deleted from the LDP without having any impact whatsoever on its ability to attain its employment provision target. The allocation of EM1(ii) is thus a very substantial over-allocation of some 320 hectares which would, at present take up rates of 11.4 hectares per year (described at paragraph 2.70 of the LDP as "appropriate") would take approximately 28 years to complete. Even this is an underestimate, given that an element of the additional approximately 469 hectares allocated in policy EM2 (Regeneration Sites) would also be employment land development. This is acknowledged in line 1 of policy EM1.

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The local planning authority admits (Sue Hall pers comm.) that EM1 (i) and EM1 (ii) are not required to attain the LDP employment land provision target.).

In the light of the significant adverse impact on the UK-nationally important Gwent Levels SSSI and the UK, Wales and Newport Biodiversity process Priority Habitat Coastal and Floodplain Grazing Marsh set out else where in this representation which would be likely to arise as a result of the allocation of this site, the fact that it is not required adds weight to the RSPB's view that it should not be allocated.

The Brownfield Test:

Para 4.8.1 of PPW states :-

"Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high ecological value"

The SSSI designation, and UK, Wales and Newport Biodiversity Priority Habitat classification of the Gwent Levels shows that they are of high ecological value, and the fact that there is no need for the proposed allocation shows that it is possible to use brownfield land in preference.

Policy SP4 of the Deposit Draft LDP criterion (ii) states :-

(ii) THE REUSE OF PREVIOUSLY DEVELOPED LAND ... IN PREFERENCE TO GREENFIELD SITES WHERE POSSIBLE"

The RSPB supports this policy, and furthermore believes that with the largest brownfield resource in Wales, it is possible to act in conformity with it.

As stated above, approximately 28 years would elapse after the end of the plan period before EM1(ii) would be developed. Paragraph 1.21 of "LDP's Wales 2006" states: -

"it is important that proposals are... likely to be implemented during the plan period".

The RSPB considers that, given that there is no need for EM1 (ii), and that pursuit of para 4.8.1 would result in it being developed last, this proposed allocation is not in conformity with PPW and LDPs Wales.

This view is given added weight by the fact that the site has been allocated in previous development plans for many years without being developed, even during periods of rapid economic growth in Newport. Given that Wales is suffering its worst economic downturn for several decades, even disregarding the insurmountable environmental constraints associated with the site, the RSPB considers that it is extremely unlikely to be required during the plan period.

Test of SoundnessRationale

CE1The local planning authority's approach to the allocation of this site is not coherent, because the site is not needed, and its development would be damaging and contrary to WG planning and wider public policy.

Certainty and Deliverability:

PPW paragraph 2.1.7 states :-

"LDPs should give developers and the public certainty about the type of development that will be permitted at a given location" (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period. This certainty requirement is further frustrated by the very restrictive criteria set out in criteria a. to d. of Policy EM1

Whilst it is acknowledged that the wording employed in policy EM1 is very similar to that agreed with the RSPB in respect of UDP Policy ED1during the 2006 Public Inquiry, the fact that EM1 (ii) has still

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not been developed after many years of being allocated (see above) constitutes a major material change of circumstances, requiring a new approach.

The RSPB believes that the proposed allocation should be deleted, and that, if a developer wishes apply for consent for a development in this location, it should be dealt with via the departure procedures outlined in para 3.12.1 et seq of PPW, and Welsh Office Circular 39/92.

Advantages of this Approach: The advantage of this approach is that it reduces uncertainty and environmental blight relating to land at this location, and facilitates the environmentally-sustainable management of the SSSI to further its condition, as required by the WG target on SSSI condition. This approach does not preclude a developer from submitting a planning application in respect of the site, and departure procedures allow him to construct a case to the effect that his development proposal is in conformity with national and Newport planning policy.

Test of SoundnessRationale

C2In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty.

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government's duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI's and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

It would further be in conflict with established and widely recognised good planning practice in terms of environmental assessment, the resourceful use of land, and the use of supplementary planning guidance.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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RSPB Objection to EM1(ii) I want to speak at the hearing session because the Proposed Allocation goes to the heart of the plan, making it fundamentally unsound. This merits a searching examination of the issues.

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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C1, C2, C3, CE1, CE2.

Individual tests are referred to in the main body of this representation.

Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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232.D1/6.35/EM02.	DET - Welsh Assembly Government			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.78, para.6.35

Policy: EM02.10

Summary: Requirement to deliver a primary school as part of the site could undermine the deliverability of the site.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number EM2(x)	
3	3	Paragraph or section number(s) 6.35	
7	7	A new paragraph or new text.	Yes
11	11	Site Name Whiteheads	
14	14	Representation Reference in para 6.35 - change text from....."a primary school will be required as part of the development".....to.....the Council will seek to negotiate the provision of a primary school on site or alternatively, appropriate financial contributions to the provisions of a primary school on site or off site as part of a comprehensive development of the Whiteheads site"....Whilst the Welsh Government supports this allocation, there are significant costs associated in bringing this key brownfield site forward for development. The requirement to provide a primary school as part of any development could however undermine the viability of any future scheme. Consequently, the funding mechanisms for the provision of the school should take into account site viability and constraints in order to deliver the key regeneration objectives of the plan and meet the requirements of soundness test CE2.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE2	

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244.D1	Welsh Assembly Government			29/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.0

Summary: General front cover letter

Item Question Representation Text

14 14 Representation

Thank you for your letter of 12th April 2012 including copies of the Deposit Local Development Plan (LDP) and accompanying documentation.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. I have considered the Deposit LDP in accordance with the consistency/coherence and effectiveness tests, and principally in accordance with whether satisfactory regard has been given to national planning policy (test C2). The Welsh Governments representations are separated into 4 categories which are supported with more detail in the attached annex.

Category A: Objection under soundness tests C2, CE2: Fundamental issues that are considered to present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:

- (i) Housing Provision
- (ii) Affordable Housing Target
- (iii) Scale of Employment Allocations
- (iv) Deliverability of Employment
- (v) Mineral Safeguarding and Apportionment

Category B: Objections under soundness tests C2, CE1, CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

- (i) Affordable Housing Thresholds
- (ii) Delivering Infrastructure
- (iii) Monitoring

Category C: In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, we consider there to be a lack of certainty or clarity on the following matters which we consider we can usefully draw to your attention to enable you to consider how they might be better demonstrated:

- (i) Gypsies and Travellers
- (ii) Major Road Schemes
- (iii) Policy Wording

Category D: Matters relating to clarity of the plan generally which we consider may be of assistance to your authority and to the Inspector in considering suitable changes: Please refer to annex.

It is for your authority to ensure that the LDP is sound when submitted for examination and it will be for the Inspector to determine how the examination proceeds once submitted.

You should consider how you could maximise the potential of your LDP being considered 'sound' through the examination process. An early meeting is considered important to discuss matters arising from this formal response to your deposit LDP and I would encourage you to contact me to arrange a mutually convenient time.

15 15 Do you want to speak at Public Examination? Neither
Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D2//SP10	Welsh Assembly Government			29/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Policy: SP10

Summary: Housing provision should match housing requirement - currently an over provision.

Item Question *Representation Text*

2 2 Policy Number
SP10

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Category A. Objection under soundness tests C2, CE2: Fundamental issues that are considered to present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:

A i Housing Provision

Planning Policy Wales (PPW) (paragraph 9.2.2) states that the latest Welsh Government (WG) population and household projections should form the starting point when assessing housing provision for the plan. In this case, the WG 2008 projections are the most recent.

Converting the 2008 household projections into dwellings (using a conversion factor of 1:1.04) indicates 7,421 dwellings are required over the plan period 2011 to 2026. It is for the LPA to consider the appropriateness of these projections for their area, reflecting the criteria listed in PPW (paragraph 9.2.1) including the key issues identified in the plan. All local authorities have access to the model and data and can re-run to reflect local circumstances.

The 'Housing Forecasts Background Paper' (April 2012) states that the first five years of the plan (2011-2016) are based on the 2008 WG projections, 2,500 units (500 p/a) to reflect the 'realities of the current economic situation'. The second phase (2016-21) is based on the more 'optimistic' forecasts of the WG 2006 projections, 3,250 units (650 per annum). The final phase of the plan is also based on the WG 2006 projections, 3,000 units (-250) (600 per annum). The stated reason for the reduction of 250 units in the final phase is to take into account 'the lower growth in the first five years, feeding through to subsequent years'.

While the growth and regeneration aspirations of the plan are supported, the justification for this 'mismatch' of methodologies is illogical and not supported by robust evidence.

Accepting the WG 2008 projections methodology at the start of the plan period implies that the local authority agrees the methodology and data. Whilst the methodology between projections has not varied significantly, there are differences in the data and assumptions behind that data, i.e. migration rates. Consequently, it is not appropriate to pick and mix between different projections. PPW states that the latest projections should form the starting point which would result in a lower provision than provided for in the plan. The evidence therefore needs to justify why a higher level is appropriate. It does not.

There is a major disparity between the housing requirement in Policy SP10 and the 'main sources of housing land' set out in Chapter 5. Policy SP10 makes provision for 8,750 dwellings, Chapter 5: Housing identifies the main sources of housing land. The table (below) has been produced to better understand the total provision within the plan.

Units to be delivered in the plan period (2011-2026).

This calculation is based on the information and tables in Chapter 5.

Commitments 3245

S106 303

Sites under construction to be completed in plan period (likely 4630 completions in plan period)

Windfall Allowance 750

New Housing Allocations 2775

Small Sites (estimated from 2010 JHLA Study see below comments) 726

Total allocation over the plan period 12,429

The plan makes provision for a total of 12,429 dwellings, 30% above the 8,750 provision set out in SP10. Housing provision set out in policy should be matched by the total provision identified in the plan itself. It does not. This is a serious concern. In addition, the total provision is in excess of 5,000 dwellings above the WG 2008 projections (68%). Whilst we support growth and regeneration aspirations the total provision is extremely excessive given the latest WG 2008 projections which indicate a need for 7,421, dwellings. There is no evidence to support such a significant deviation above our latest projections. Currently there is:

- Insufficient evidence to support the level of housing provision.
- The relationship to employment provision and the overall strategy is unclear.
- The rationale/need for allocating an additional 2775 units is absent.
- It is not clear how new allocations support the delivery of existing commitments, in particular the large brownfield regeneration sites at East Newport which are the focus of the spatial strategy (paragraph 2.5, p13).
- How the phasing of housing, 2,500/3,250/3,000 units will be controlled/implemented.
- There is no specific flexibility/rationale for a set level in Policy SP10.
- No estimate for small site provision has been made. (Paragraph 5.9 of the plan states that 274 small site plots had permission at 1st October 2011. The 2010 Joint Housing Land Availability Study (JHLA) states that the small site provision is 242 units (2010-2015) which extrapolated over the plan equates to 726 units.

The plan does not appear to deliver the strategy, a focus on regeneration, culture and heritage through maximising the use of brownfield land). There are a variety of sites contained in the plan, both

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
brownfield and greenfield of significant scale and it is not clear how a regeneration strategy will be delivered with such a plethora and mix of sites, lacking any prioritisation. It must be questioned whether a more appropriate approach would be to deliver existing commitments before allocating additional sites which could dilute a regeneration based strategy. Many of the key regeneration sites in East Newport are commitments and not allocations.										

15	15	Do you want to speak at Public Examination?								Neither
		Not Ticked								

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1	1	I think the LDP is sound.								No
13	13	Test of Soundness C2 and CE2								

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
244.D3//H04	Welsh Assembly Government			29/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.66

Policy: H04

Summary: Plan should include an authority wide affordable housing target.

Item Question Representation Text

2 2 Policy Number

H4

14 14 Representation

Category A. Objection under soundness tests C2, CE2: Fundamental issues that are considered to present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:

A ii Affordable Housing Target

PPW (paragraph 9.2.16) states that LDPs must include an authority-wide target for affordable housing (expressed as a number of homes) based on the Local Housing Market Assessment (LHMA) and identify the contributions that the policy approaches identified in the plan will make to this target. A Joint LHMA (2007) has been undertaken, a combined assessment between Torfaen, Newport and Monmouthshire. The level of need should be expressed in the plan, it currently is not. There is also no quantification of any backlog of need, how this relates to the current need and how this will be carried forward.

Chapter 8 gives some additional information for the new allocations; however it is confusing and does not relate to the target set out in policy H4. For example, sites H1(49) & (50) state that provision "will be in line with planning obligations" while other allocations such as H1(52) & (53) give a target of 30%, H1(54) "to be negotiated with the NCC", H1(55) & (56) "to be negotiated in line with the DAT". It is not clear from the plan how many affordable housing units each site will deliver, both commitments and allocations. The plan should have a clear target and set out the sources of contributions to meeting this target. It is concerning that the supporting text of Policy H4 refers to SPG on Affordable Housing (2004) produced for the UDP, which contains different thresholds to those set out in the LDP policy. Similarly Chapter 8 refers to the Planning Obligations SPG (2007), also prepared for the UDP. Chapter 14 states that these documents are of 'high' priority for updating, however, no timescales have been given.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

13 13 Test of Soundness

C2, CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
244.D4//EM01	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.73

Policy: EM01

Summary: Over provision of Employment land.

Item Question Representation Text

14 14 Representation

Category A. Objection under soundness tests C2, CE2: Fundamental issues that are considered to present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:

A iii – Scale of Employment Allocations

There is a major disparity between the employment land requirement in Policy SP17 and the total allocated land set out in Policy EM1: Employment Land Allocations and EM2: Regeneration Sites. The Employment Context Background Paper (2011) concludes that 11ha per annum is considered to be a robust long term fixed projection of future employment land requirements in Newport (p18). Over the plan period, the employment land requirement is 165ha, this is set out in Policy SP17. The policy and provision of employment land should match, it does not.

However, the total allocation in Policy EM1 and EM2 is in excess of 685ha. The quantity allocated is excessive and unjustified through any evidence. It is not clear what the priorities are in terms of employment, how this links to the housing provision and which employment sites are required to deliver the strategy. In addition, further clarification is required to determine the total number of hectares of employment land allocated under policy EM2.

There is no evidence to support a figure in excess of 685 hectares provided in the plan, as set out below.

(See Hyperlink)

There appears to be further disparity when comparing the figures in the Employment Context Paper to those in Policies EM1 and EM2. Paragraph 7.2, p20 states that at of 31st March 2010, there is over 258ha of available employment land in Newport which does not correspond to the 165ha in SP17 or the 685ha in policies EM1 and EM2. In addition the total hectares listed for some of these sites in the background paper do not correlate to the total hectares indicated in the policies. Some examples:

- Policy EM1, East of Queensway Meadows is 142ha, the Employment Context Paper states 35.4

- Policy EM1, Celtic Springs is 6ha, the Employment Context Papers states

7.7ha

- Policy EM1, Gwent Euro park is 16ha, the Employment Context Paper states

22.20ha

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 and CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
244.D5//EM01	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.73

Policy: EM01

Summary: Deliverability of the employment allocations is questionable.

Item Question Representation Text

14 14 Representation

Category A. Objection under soundness tests C2, CE2: Fundamental issues that are considered to present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:

A iv Deliverability of Employment

Many employment allocations have significant constraints (Employment Context Paper, Chapter 7) and in several cases these constraints are likely to affect the timing, viability and the developable area, albeit some sites appear to be at a greater risk than others. This background paper categorises the currently available sites in four ways, prestige sites (191ha), good industrial (28ha), local industrial (34ha) and central (5.6ha). Appendix 1 lists the sites and constraints which generally relate to, flood risk, overhead pylons, potential ground contamination, and access. Paragraph 7.3 states that of the total employment land available, only 19ha is considered to be immediately available and free from constraint. A further 45ha of employment land should be available in the short-term once relatively minor site constraints have been resolved. Between them this equates to only 25% of the total employment land supply in Newport.

The report also states that the more desirable prestige land is subject to considerable site constraints with only 30ha available immediately or in the short term. Further evidence is required to demonstrate that constraints would not restrict development, or impact on the total developable area of the allocations. Some examples include:

- East of Queensway Meadows (142ha) much of the site is located in a SSSI and the development of this area is affected by the M4 relief road safeguarded route. The site is allocated for projects of at least 20ha with sufficient national economic interest to outweigh environmental impacts. There are also issues relating to C1 flooding, overhead pylons and loss of habitats.

- Solutia (52 ha) the M4 relief road safeguarded road lies to the South of the site.

There are also issues relating to C1 flooding, overhead pylons and loss of habitats.

- Newport Docks – the M4 relief road route runs through the central portion of the site.

There are also issues relating to loss of habitats.

- Gwent Europark – located within a SSSI and C1 flood zone.

It is vital that the plan is clear on the level of provision sought, it is based on robust evidence and includes a monitoring framework which includes appropriate triggers that will inform potential shortfalls if they arise and how they would be addressed. Clarity on why UDP allocations have been rolled forward and their appropriateness for continued inclusion would be beneficial.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 and CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
244.D6//M1	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.110

Policy: M1

Summary: Additional sand and gravel resources should be identified on the Proposals Plan.

Item Question Representation Text

14 14 Representation

Category A. Objection under soundness tests C2, CE2: Fundamental issues that are considered to present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:

A v – Mineral Safeguarding

Limestone and sand and gravel resources have been safeguarded in line with the Cuesta study commissioned by Torfaen on behalf of the former Gwent authorities. However, there are further sand and gravel resources identified on the BGS mapping which are not safeguarded which should be, for example around the Coedkernew area south of the M4 and at Caerleon. These should be identified on the proposals map.

The Regional Technical Statement (RTS) recognises the constraints faced by Newport in contributing towards maintaining an adequate supply of minerals, which is a requirement of national planning policy (MPPW and MTAN 1 Aggregates). The Cuesta Study considered the obligations placed on Newport by the RTS and concluded that Newport would have difficulties in fulfilling the allocation obligations for hard rock, and as a result should consider whether the authority can rely on resources available in adjacent authorities.

The RTS is dated October 2008 and the Cuesta Study May 2009, yet no formal approach was made to the adjacent authorities until September 2011, this is disappointing. The plan is silent on the matter of its RTS apportionment and as a result does not accord with national planning policy or the RTS. The failure to fulfil national policy obligations to contribute towards the maintenance of an adequate supply of aggregates should be recognised. The RTS recommends that there will be demand for approximately 8-8.5 million tonnes of aggregates within the area, of which 38.4% will need to be accounted for by Newport.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2 and CE2

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D7//H04	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.66

Policy: H04

Summary: Plan insufficiently clear on affordable housing figures.

Item Question Representation Text

14 14 Representation

Category B. Objections under soundness tests C2, CE1, and CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

B i – Affordable Housing Thresholds

We note that an Affordable Housing Viability Study (2012) was carried out. The findings of the report suggest that there is a three way viability split which could more specifically respect local market circumstances (40% Caerleon and Rural Newport, 30% Rogerstone and Newport West, 10% for Newport East, Malpas and Bettws). It is not clear why this option was discounted as the study suggests this is the option would maximise the delivery of affordable housing over the plan period, particularly as this is a Ministerial priority. In addition, it is not clear if the Council have considered using commuted sums in order to secure affordable housing on sites below 3 units. The council should do all it can to maximise delivery of affordable housing.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2, CE1 and CE2

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D8//SP13	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.25

Policy: SP13

Summary: Council needs to have the necessary infrastructure in place to deliver the development proposed in the LDP.

Item Question Representation Text

14 14 Representation

Category B. Objections under soundness tests C2, CE1, and CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

B ii – Delivering Infrastructure

It is imperative that the Council secure the infrastructure necessary to deliver the development proposed in the Local Development Plan. The Council needs to be in a position where it has the appropriate mechanism in place to secure financial receipts from development in order to meet the identified requirements. A policy vacuum, leading to insufficient financial receipts to deliver the required infrastructure should be avoided. Further explanation should be provided to demonstrate how this situation is not an issue, or, if it is how will it will be resolved.

We note that the authority intend to adopt a CIL charge. However, Policy SP13 CIL does not indicate any timescales for its preparation. After 6th April 2014 the CIL Regulations limit the ability to secure infrastructure through planning obligations, pooled S106 contributions (5 or more) will no longer be allowed. The council needs to explain how this will impact on the delivery of infrastructure, the strategy and timing.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
C2, CE1 and CE2.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D9//Monitorin	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.117

Policy: Monitoring Framework

Summary: Monitoring Framework has some shortcomings regarding ranges, trigger points and unspecified appropriate remedial actions.

Item Question Representation Text

14 14 Representation

Category B. Objections under soundness tests C2, CE1, and CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

B iii – Monitoring

The mechanisms for implementation and monitoring need to be sufficiently clear and sensitive to provide an early alert to non-delivery. An appropriately transparent and comprehensive monitoring framework should be an integral part of an LDP. The LDP monitoring framework (Chapter 12) has some shortcomings regarding ranges, trigger points and unspecified appropriate remedial actions. It is difficult to determine what/when would lead to a review of key policies within the plan. Appropriate trigger points that would allow sufficient time to consider and introduce alternatives should be included within the monitoring framework. Some key examples include the target/indicator for H4, there is no target for affordable housing, and therefore it is difficult to see how this could be monitored. The monitoring target for H1 also requires revision. A target of 90% by the end of the plan period is not acceptable. More frequent timescales should be included in the targets to ensure that a review could be triggered if sites are not coming forward as anticipated.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2, CE1 and CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
244.D10//H15	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Policy: H15

Summary: Plan should clearly demonstrate that the sites can accommodate the identified pitch need.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

C i Gypsy and Traveller Sites

Land is allocated in the Plan to meet the identified need of 27 authorised pitches and 7 transit pitches. It should be clearly demonstrated that the sites can accommodate the identified pitch need within the plan period. The assessment of pitch need detailed in the 2009 Fordham Needs Assessment covers the period to 2019 and not 2026, not the LDP period. The scale of need over the last 7 years of the plan period and how this will be accommodated (if required) should be clarified.

It should be noted that some text is missing from paragraph 2.2 of the Gypsy and Traveller Sites paper April 2012. Details of the missing text should be provided to ensure that fundamental evidence has not been omitted from the background paper.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

CE2, CE3 CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D111//SP16	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.27

Policy: SP16

Summary: Plan needs to consider how Newport would cope if all the proposed development came forward without the necessary highway infrastructure in place.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

C ii - Major Road Schemes

The rationale for linking key regeneration sites, road and new rail infrastructure is accepted, although it is noted there may be some constraints relating to flooding and habitat issues. A proportion of the schemes delivery in some cases is tied to developer contributions. A fundamental question not made clear in the plan is what happens if all the development came to fruition without the associated highway infrastructure, this would be a particular issue if the CiL is not in place by April 2014. The ability to pool resources to assist with the deliverability of major infrastructure would be extremely curtailed.

The monitoring indicators in relation to the delivery of key transport infrastructure rail are inadequate. (See comments in relation to the monitoring framework).

15 15 Do you want to speak at Public Examination? Neither
Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2, CE3 and CE4.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D12//R6	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.92

Policy: R6

Summary: Policy R6 and R7 appear to contradict each other.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

The authority should consider whether the excessive number of policies in the plan are required, or whether they are adequately dealt with in National Planning Policy. The LDP does not need to reiterate what is contained in planning policy advice.

The wording of some of the policies is confusing and may not deliver the objectives originally intended. Examples are Policy R6 'Newport Retail Park District Centre' and R7 'Newport Retail Park District Centre Proposals'

Policy R6 states that no additional retail floor space will be permitted at Newport Retail Park District Centre. Policy R7 seems to run counter to this fairly definitive policy in that criterion (ii) of the policy advises that proposals will be permitted provided that any retail unit proposed is greater than 500 m2.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2, CE1 and CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D13//CF02	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.100

Policy: CF02

Summary: Could restrict the facility being redeveloped or an alternative use is the viability of the existing use becomes problematic.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

Policy CF2 'Protecting Sub Regional Sport and Leisure Facilities'. This policy as worded would prevent the loss of all or any part of the principal use of the site for other uses. This could result in privately owned facilities being left vacant, rather than being redeveloped for other alternatives uses, if the viability of the existing facility became problematic.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2, CE3, CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D14/CE06	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>		O		M	

Document: Deposit Plan, p.51

Policy: CE06

Summary: Policy is more appropriately dealt with in SPG.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

The need for some detailed policies of the plan is not justified. Policy CE6 'Shop fronts' provides detailed guidance on the design of new shop fronts which it is considered would be more appropriately contained in SPG. PPW provides advice on design which could be supplemented by a general policy on design, rather than having numerous detailed policies which have the overarching aim of securing good design. This could also be true in relation to policy CE7 'Signs and Advertisements'.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2, CE3, CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D15//CE07	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.51

Policy: CE07

Summary: Policy is more appropriately dealt with in SPG.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

The need for some detailed policies of the plan is not justified. Policy CE6 'Shop fronts' provides detailed guidance on the design of new shop fronts which it is considered would be more appropriately contained in SPG. PPW provides advice on design which could be supplemented by a general policy on design, rather than having numerous detailed policies which have the overarching aim of securing good design. This could also be true in relation to policy CE7 'Signs and Advertisements'.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2, CE3, CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D16//GP06	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.44

Policy: GP06

Summary: Design considerations are more appropriately dealt within SPG

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

The above are examples of where there are concerns over the rationale and wording of policies to ensure that they are implementable in accordance with the strategy of the plan as a whole and defensible in decision making. The plan must provide the essential framework for rational and consistent decision making. The focus for area wide policies should include, inter alia, design, but more detailed considerations are more appropriately contained in SPG, which can be more easily updated to adapt to changes in circumstances. The need for detailed design requirements to be contained in SPG is referred to in paragraph 2.20 of Local Development Plans Wales: Policy on Preparation of LDP's.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2, CE3, CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D17//W1	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.113

Policy: W1

Summary: Flexibility in policy to consider alternative options needs to be considered.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

The flexibility of policies to deal with changes in circumstances should also be considered. For example Policy W1 Waste Site Allocations: (4ha at Llanwern Steelworks). This site is being considered as part of Prosiect Gwyrdd along with another site in South Wales. The policy in its current format is not flexible in terms of allowing other uses if the site is not required for this purpose.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

CE2, CE3 and CE4

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
244.D18//SP09	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.21

Policy: SP09

Summary: Overly onerous to apply to all developments.

Item Question Representation Text

14 14 Representation

Category C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, there is considered to be a lack of certainty or clarity on the following matters which can usefully be drawn to your attention to enable you to consider how they might be addressed:

There are also example of where a policy is more akin to a statement of intent rather than a policy. For example, SP9 seems overly onerous to apply to all proposed developments and it should be recast to reflect its application to protected areas or be deleted.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2, CE3 and CE4.

244.D19//T1 Welsh Assembly Government

25/05/2012 E O M

Document:Deposit Plan, p.82

Policy: T1

Summary: Railways proposals should be specifically labelled in the proposals plan.

Item Question Representation Text

14 14 Representation

All stations are indicated on the proposals map with T1, there is no specific labelling for the individual proposals which is confusing. It is not easy to determine what 'T1' relates to which new station.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D20//SP17	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.29

Policy: SP17

Summary: Typographical error

Item Question Representation Text

14 14 Representation

Paragraph 6.1 refers to Policy SP147. this is typographical error and should read SP17. The plan has other typographical errors.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

244.D21//CE08 Welsh Assembly Government

25/05/2012 E O M

Document:Deposit Plan, p.53

Policy: CE08

Summary: Registered Historic Parks and Gardens should be shown on the Proposals plans.

Item Question Representation Text

14 14 Representation

Proposals Maps - These should show areas of registered historic parks and gardens (as Powys LDP). Tredegar Park, for instance, is shown only asa Conservation Area.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D22//SP09	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.21

Policy: SP09

Summary: There are 11 Registered Historic Parks and Gardens, not 10.

Item Question Representation Text

14 14 Representation

Page 21 Paragraph 2.34. There are 11 registered historic parks and gardens in Newport not 10. This has, however, been stated correctly on page 53.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

244.D23//CE08 Welsh Assembly Government

25/05/2012 E O M

Document:Deposit Plan, p.53

Policy: CE08

Summary: Setting should be a consideration as well.

Item Question Representation Text

14 14 Representation

Page 53 - CE8 Historic Landscapes, Parks, Gardens and Battlefields Paragraph 4.26 needs revising as it is out of date. The sentence beginning 'All applications affecting these sites.....'Should read: "All applications affecting these sites their Essential Settings and Significant Views will be referred to Cadw - the Welsh Government's Historic Environment Service." as the Garden History Society no longer advises on planning applications in Wales.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D24/SP03	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.16

Policy: SP03

Summary: Improved flood resilience is the term to use rather than flood defence improvements.

Item Question Representation Text

14 14 Representation

D iv Flood Risk - SP3: References to flood defence improvements for existing developments (e.g. paragraph 0.7) should be amended to refer to "improved flood resilience over the short to medium term". As the sites along the River Usk have come forward and have been built taking into account climate change up to 2056 not 2106. In addition, Policy SP3 (Flood Risk) requires further clarification/amendment to align with TAN 15 'Development and Flood Risk'.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

244.D25	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.152

Summary: No indication of timescale in the list of SPG.

Item Question Representation Text

14 14 Representation

In the list of SPG there is no indication of timescales for their preparation, especially for those that of high priority. The monitoring framework fails to include the preparation of SPG as considerations for targets and triggers.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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244.D26//H05	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.66

Policy: H05

Summary: Reference to Gypsy and Traveller Accommodation should be removed.

Item Question Representation Text

14 14 Representation

D vi Policy H5: Affordable Housing Rural Exceptions (Para 5.15): The reference to "Gypsy and Traveller accommodation" should be removed. If the Authority consider it necessary to have a Gypsy and Traveller rural exception site policy, this should be included as a separate policy (paragraphs 28 & 29, Circular 30/2007, 'Planning for Gypsy and Traveller sites). it is not appropriate to conflate this with affordable housing requirements.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

244.D27//Objectiv	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.11

Policy: Objective 6(2)

Summary: Rephrase to 'improve' the natural environment.

Item Question Representation Text

14 14 Representation

D vii Page 11 : Conservation of the Environment (2) : This objective could be rephrased to include the objective to 'improve' the natural environment (paragraph 5.1.2 PPW refers).

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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244.D28//M1	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.110

Policy: M1

Summary: Written justification needs to be clear about the factors which may influence resources.

Item Question Representation Text

14 14 Representation

Policy M1: The policy is written as an absolute to cover all resources, yet the reasoned justification indicates that there may be reasons for allowing development. In doing so the reasoned justification should be clear about the factors which may influence this and the process which would be expected, this could reasonably vary for sand and gravel as opposed to hard rock but the explanation should provide more clarity than as drafted.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

244.D29//M1	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.110

Policy: M1

Summary: Useful to separate sand and gravel and hard rock.

Item Question Representation Text

14 14 Representation

Proposals Map: Minerals - Contains 'safeguarding of mineral resource' delineation and a 'sand and gravel reserves' delineation to which policy M1 applies. It is useful to separate sand and gravel and hard rock (limestone) in terms of safeguarding but the labelling of these areas needs to be accurate. In particular the use of the word 'reserves' to label sand and gravel 'resources' is inaccurate.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
244.D30//M2	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.110

Policy: M2

Summary: Policy is a repeat of national policy and should be revisited.

Item Question Representation Text

14 14 Representation

Policy M2 - Mineral Development - The policy as written represents a repeat of national planning policy and should be revisited.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

244.D31//M3 Welsh Assembly Government

25/05/2012 E O M

Document:Deposit Plan, p.111

Policy: M3

Summary: BGS Resource Mapping should be considered to see if there are any resources which may harbour the potential for natural gas.

Item Question Representation Text

14 14 Representation

Policy M3 Oil and Gas - The BGS Resource Mapping should be considered to see if there are any resources which may harbour the potential for natural gas. Should this not be the case then arguably this policy does not add anything to national policy in MPPW on onshore oil and gas (paragraphs 64-65). In addition, it is unclear why policy M2 should be relevant to oil and gas. The criteria in policy M2 are largely specific to aggregates not energy minerals, with the exception of restoration and aftercare. There are some unqualified statements in the reasoned justification about the environmental risks, for example 'associated development' posing 'major environmental problems'.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
244.D32//W1	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.113

Policy: W1

Summary: If South of Llanwern is not chosen as the preferred site for Prosiect Gwrydd the allocation should be reconsidered.

Item Question Representation Text

14	14	Representation								
Policy W1: Flexibility - We note that the South of Llanwern site is one of two shortlisted sites for Prosiect Gwrydd. If the site is not chosen (which will be known within the plan period) and then alternative options for the site would need to be considered in due course.										

15	15	Do you want to speak at Public Examination?	Neither							
Not Ticked										

Item Question Soundness Test

1	1	I think the LDP is sound.	No							
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244.D33//W2	Welsh Assembly Government			25/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.114

Policy: W2

Summary: Amount of land required should be 12.6ha minus 4ha already identified at Llanwern.

Item Question Representation Text

14	14	Representation								
Policy W2: The amount of land required should be 12.6ha minus 4ha already identified at Llanwern. It is not clear why detailed assessments are required to meet the estimated land requirement of up to 12.6 ha. Either the required amount of suitable land to support an adequate network of waste management facilities is potentially available or not.										

15	15	Do you want to speak at Public Examination?	Neither							
Not Ticked										

Item Question Soundness Test

1	1	I think the LDP is sound.	No							
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
250.D1//SP11	Persimmon Homes(Wales) Ltd	White Young Green		10/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.23

Site: 310/ Llanwern, Underwood

New Site

Policy: SP11

Summary: Amendment to policy SP11 to acknowledge the future development potential of the Eastern Expansion Area

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP11	
3	3	Paragraph or section number(s) 2.40 - 2.44	
7	7	A new paragraph or new text.	Yes

Representation Details

Newport City Council Local Development Plan

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Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Policy SP11 (paragraphs 2.40-2.44) is the deposit LDP policy for the Eastern Expansion Area (EEA) of Newport. The selection of the EEA followed consideration of various options for the accommodation of major growth around the city and the rationale for that selection is as valid today as when the existing development plan (the Newport Unitary Development Plan 1996-2011) was being prepared. In adopting the UDP, the Council took the strategic decision to develop Newport in an easterly direction and embedded that proposal for a sustainable urban extension as an integral element of the future regeneration of the city. Indeed, the EEA is described in the UDP (paragraph 5.10) as "...a key part of the vision of the Newport Regeneration Programme". The deposit LDP Written Statement does not reflect this level of commitment to the EEA.

For the EEA, LDP Policy SP11 allocates land for 4000 new dwellings south of the railway (Glan Llyn) and for 1100 new dwellings around Llanwern village. Both allocations already have planning permission and have been acknowledged previously by the City Council as the first phase of development on this side of Newport. However, paragraph 2.42 of the deposit LDP merely states:

'Other land is also included within the Eastern Expansion Area, and further detail can be found in the adopted East Newport Development Framework Plan supplementary.'

The East Newport Development Framework Plan, which was adopted by the City Council in May 2007, relates to a large area of land south of the M4 motorway, extending from the A456 Ringland Way in the west to the settlement of Underwood in the east. Paragraph 4.4 of the development framework identifies longer term potential for up to 2500 new homes in the north (in addition to the 4000 new homes at Glan Llyn), which includes the 1100 granted planning permission in the vicinity of Llanwern village. This leaves potential for a further 1400 new homes in the north. Paragraph 4.4 states:

'Further development in the north beyond the first phase identified in the SPG will need to be subject to the next plan, which will be a Local Development Plan.'

As noted above, the deposit LDP is silent about future phases of development in the EEA. Hence, as matters now stand, the acknowledged potential of the northern part of the EEA is not dealt with satisfactorily in either the deposit LDP or the adopted SPG.

The northern part of the EEA includes a large area of land - amounting to 164 hectares - that is in the joint freehold ownership of the Welsh Government and Persimmon Homes (Wales) Ltd: see plan attached. The site is predominantly in use as agricultural land (mainly Grades 3B and 4) and as woodland and is substantially free of statutory planning and other restraints; those restraints that do exist (such as an historic park could be easily accommodated within the development layout).

It is accepted that national policy favours the release of brownfield rather than greenfield sites. However, Planning Policy Wales also supports the principle of choice, including choice of location. It is considered that the high proportion of brownfield sites within the housing land allocation is unlikely, in the longer term, to offer sufficient choice and flexibility or to deliver the range and mix of housing required to meet the city's needs. Clearly the Council does not view greenfield development at Llanwern as unsustainable or inappropriate, having already granted planning permission for 1100 new homes.

The WG/ Permission land holding offers the major opportunity to continue the City Council's previously declared long term, city-wide regeneration strategy initiated in the UDP. The elements of this strategy are designed to:

- complement the redevelopment of brownfield sites within the city;
- support regeneration in the inner urban area and in other communities such as Underwood;
- provide for range and choice of living environments in an attractive setting;
- contribute to the costs of providing and subsequent retention of good public transport, schools and other community services.

The City Council's strategic decision to focus new development in the EEA is not fully represented in the LDP, which does not recognise the future development potential of the area. An additional paragraph should be inserted under Policy SP11, acknowledging the future development potential of the rest of the EEA and reaffirming the City Council's selection of this area as a focus for future growth in Newport.

For the above reasons, it is considered that the LDP does not meet the following soundness tests:

Consistency test C1: It is a land use plan which has had regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.

Coherence and effectiveness test CE1: The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
Additional Information Submitted - Available on Request										
15 15	Do you want to speak at Public Examination?		No							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness C1, CE1									
277.D1//SP16	Graham AM, Mr William			10/07/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.27

Policy: SP16

Summary: Supportive of the future expansion of the A48 southern distributor road between junctions 24 and 28 of the M4.

<i>Item Question</i>	<i>Representation Text</i>									
14 14	Representation									
	I write to support the broad objectives contained in the current Local Development Plan put forward following considerations in respect of strategic trunk road improvements which would affect the City. I am in favour of the expansion of the A48 southern distributor road between junctions 24 and 28 of the M4 Motorway. This has minimal implications for housing provision but access to commercial and industrial sites served by the A48 will require further exploration as part of the consultations by the Welsh Assembly Government in respect of the M4 corridor enhancement measures.									
15 15	Do you want to speak at Public Examination?		Neither							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		Neither							

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
277.D2//SP14	Graham AM, Mr William			10/07/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.26

Policy: SP14

Summary: Seeking traffic improvements through villages of Bassaleg and Rhiwderim in form of bypass.

Item Question Representation Text

14 14 Representation

The second consideration is an improvement to traffic through the villages of Bassaleg and Rhiwderin. The previous bypass scheme was cancelled many years ago but I would put forward for consideration now that the Alcan Aluminium Works has ceased at Rogerstone for a bypass to be considered to the North of Bassaleg and Rhiwderin as a replacement for the A468. The reason for consideration at this time is that provision for alternative development of the former Alcan site will be necessary and a road corridor could be reserved through the site allowing access onto the A467 Risca Bypass.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
302.D1/2.35-2.39/S	Rustic Estates & Bath & W Counties P T Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.21, para.2.35-2.39

Site: 217/302.C1 Mallards Reach

Policy: SP10

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: Proposal to Include candidate site 302.C1 as a housing site due to its location adjoining an existing and established community

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number SP10		
3	3	Paragraph or section number(s) 2.35-2.39		
4	4	The Proposals Map		Yes
9	9	Amend the boundaries of an existing site.		Yes
11	11	Site Name LAND TO THE REAR OF THE MEADOWS/MALLARDS REACH, MARSHFIELD, WENTLOOGE, NEWPORT		
12	12	Site Reference 302		
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C2		
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
302.D2/4.1/CE01	Rustic Estates & Bath & W Counties P T Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.47, para.4.1

Site: 217/302.C1 Mallards Reach

Policy: CE01

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: Objection to policy CE1 and proposal to include site at Mallards Reach for residential development

Item Question	Representation Text	Soundness Test
2 2	Policy Number CE1	
3 3	Paragraph or section number(s) 4.1	
4 4	The Proposals Map	Yes
11 11	Site Name LAND TO THE REAR OF THE MEADOWS/MALLARDS REACH, MARSHFIELD, WENTLOOGE, NEWPORT	
12 12	Site Reference 302	
14 14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.	
15 15	Do you want to speak at Public Examination?	No
1 1	I think the LDP is sound.	No
13 13	Test of Soundness C2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
302.D3//SP05	Rustic Estates & Bath & W Counties P T Ltd	S.G. Williams & Associates		10/07/2012	<input type="checkbox"/>	W	O		M	
Document: Deposit Plan, p.18		Site: 388/ The Meadows / Mallards Reach			Boundary Change					

Policy: SP05

Summary: Objection to policy SP05 - Countryside and promotion of site at land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number SP5		
3	3	Paragraph or section number(s) 2.25, 2.26		
4	4	The Proposals Map		Yes
9	9	Amend the boundaries of an existing site.		Yes
11	11	Site Name Land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge, Newport		
12	12	Site Reference 302		
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C3		
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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302.D4//SP06	Rustic Estates & Bath & W Counties P T Ltd	S.G. Williams & Associates		10/07/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.19

Site: 389/ The Meadows / Mallards Reach

Boundary Change

Policy: SP06

Summary: Objection to policy SP06 Green Belt and promotion of Land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge

Item Question Representation Text

2 2 Policy Number
SP6

3 3 Paragraph or section number(s)
2.27, 2.28

4 4 The Proposals Map

Yes

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

Land to rear of the Meadows, Mallards Reach, Marshfield, Wentlooge, Newport

12 12 Site Reference
302

14 14 Representation

Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
C2

Item Question

8 8 Add a new site.

Tick-box reply

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
302.D5//SP07	Rustic Estates & Bath & W Counties P T Ltd	S.G. Williams & Associates		10/07/2012	<input type="checkbox"/>	W	O		M	
Document: Deposit Plan, p.19		Site: 457/ The Meadows / Mallards Reach		Boundary Change						
Policy: SP07										
Summary: Objection to policy SP07 Green Wedge and promotion of site at land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge										

<i>Item Question</i>	<i>Representation Text</i>	
2 2 SP7	Policy Number	
3 3 2.29	Paragraph or section number(s)	
4 4	The Proposals Map	Yes
9 9	Amend the boundaries of an existing site.	Yes
11 11	Site Name Land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge, Newport	
12 12 302	Site Reference	
14 14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13 C2	Test of Soundness	
<i>Item Question</i>		<i>Tick-box reply</i>
8 8	Add a new site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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302.D6//SP08	Rustic Estates & Bath & W Counties P T Ltd	S.G. Williams & Associates		10/07/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.20

Site: 390/ The Meadows / Mallards Reach

Boundary Change

Policy: SP08

Summary: Objection to policy SP08 Special Landscape Areas and promotion of site at land of rear of the Meadows/Mallards Reach, Marshfield, Wentlooge

Item Question Representation Text

2 2 Policy Number
SP8

3 3 Paragraph or section number(s)
2.30, 2.31, 2.32

4 4 The Proposals Map

Yes

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

Land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge, Newport

12 12 Site Reference
302

14 14 Representation

Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
C2

Item Question

Tick-box reply

8 8 Add a new site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
302.D7//H01	Rustic Estates & Bath & W Counties P T Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.62

Site: 217/302.C1 Mallards Reach

New Site

Policy: H01

Summary: Objection to policy H01 and promotion of site at land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge

Item	Question	Representation Text	Tick-box reply
2	2	Policy Number H1	
3	3	Paragraph or section number(s) 5.3 and new allocations for housing development	
4	4	The Proposals Map	Yes
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Land to rear of the Meadows/Mallards Reach, Marshfield, Wentlooge, Newport	
12	12	Site Reference 302	
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site. Additional Information Submitted - Available on Request	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	
8	8	Add a new site.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
321.D1//H01	Newbridge Ests & John Fmly	Boyer Planning		28/05/2012	<input type="checkbox"/>	P	O		M	

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 334/ Cwrt Camlas

New Site

Policy: H01

Summary: Wants candidate site at Cwrt Camlas included as considers the deposit LDP as unsound for a number of reasons in relation to Policy H1 (Housing Allocation).

Item Question Representation Text

2 2 Policy Number
H1 Housing Sites (Allocation)

11 11 Site Name
Land adj. to Cwrt Camlas, Rogerstone

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

HOUSING ALLOCATION

Page: 62

Policy Reference: Policy H1 Housing

1.0 Information

1.1 The John Family and Newbridge Estates Ltd objects to the omission of the land adjoining Cwrt Camlas, Rogerstone as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:

- C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not funded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The triangular shaped 3ha site is situated to the northwest of Junction 27 of the M4 and comprises grazing land. To the south the site immediately adjoins the recently constructed Serrenu Children's Centre and housing estate of Cwrt Camlas and is bound to the west by existing housing on Cwm Lane. The northern boundary of the site is defined by Pensarn Farm Lane, whilst the eastern boundary is defined by hedgerows separating the site from further grazing land. The site is accessed directly from the Cwrt Camlas housing estate.

2.2 Rogerstone has a good range of retail and community facilities that are all within reasonable walking and cycling distance, including post offices, a health centre, various convenience stores, public houses, take away food outlets, petrol filling stations, hair dressers, churches (various denominations) and a veterinary clinic. High Cross and Rogerstone Primary School and Bassaleg Secondary School are conveniently located to this site. There are also local employment areas at the Wern and Tregwilym Road Industrial Estates as well as at Afon Village where there is a railway station linking Rogerstone to Cardiff and Ebbw Vale.

2.3 The site is also in close proximity to a number of bus stops with shelters which are located on High Cross Road near to the junction of Cwm Lane and High Cross Lane, circa 250 meters from the site. These stops are serviced by regular bus services (linking with Newport Town Centre, approximately 2 miles distant and various towns in the eastern valley as well as the national rail network at Newport).

3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out on Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

Housing Requirement

3.2 As detailed within the separate submissions made in relation to Policy H1 – Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment a more appropriate requirement provision figure for the plan period would be 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at land adjoining Cwrt Camlas, Rogerstone would actively assist in providing a deliverable housing site to address the identified shortfall.

Settlement Boundary

3.4 As detailed within separate representations made on Policy Sp5 – Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Rogerstone. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at land adjoining Cwrt Camlas, Rogerstone.

4.2 The Development Frame Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 30 dwellings. It is therefore evident that the development of the site will seek to meet the housing need through the Development Plan period within the sustainable settlement location.

5.0 Required Change.

5.1 That the land adjoining Cwrt Camlas, Rogerstone is allocated for housing development within Policy H1 as a new site for 30 dwellings in order to meet the needs of the local community.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Additional Information Submitted - Available on Request</i>										
15 15	Do you want to speak at Public Examination?								Yes	
16 16	Subject to speak on at Examination Due to the significant issues raised in the representations.									
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.								No	
13 13	Test of Soundness Please refer to the attached representation.									
<i>Item Question Tick-box reply</i>										
8 8	Add a new site.								Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
321.D2//H01	Newbridge Ests & John Fmly	Boyer Planning		28/05/2012	<input type="checkbox"/>	P	O		M	

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 250/321.C1 Cwrt Camlas

Policy: H01

Summary: Wants the site included in the deposit LDP as they consider the plan unsound.

Item Question Representation Text

- 2 2 Policy Number
H1 Housing Sites (Numbers)
- 11 11 Site Name
Land adj. to Cwrt Camlas, Rogerstone

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

HOUSING REQUIREMENT

Page 62

Policy Reference: Policy H1 Housing

1.1 On behalf of The John Family and Newbridge Estates Ltd we object to the approach taken by the Deposit LDP with regards to the housing requirement.

1.2 We consider the approach taken by the Council against the requirements of Planning Policy Wales (PPW), which sets out criteria that Local Authorities must take account of when setting their housing requirement. Whilst the Authority has used the WG projections as their starting point, they plainly ignore the implications of the Local Housing Market Assessment that they have submitted as part of their evidence base which when based on up to date information and extrapolated forward indicates a much higher level of need than provided for.

1.3 We also consider that it is inappropriate to rely upon a number of the sites identifies within Policy H1 that are subject to numerous constraints and have remained undeliverable for some time. A number of such sites identified as "new allocations" whereas in reality they have been carried through previous plans with no developer interest or signs of such interest.

1.4 In this context and based on our consideration of the Plan in relation to National Policy requirements, it is our view that the housing requirements is wholly inadequate and contrary to the following test of soundness:

- C1 in that it does not have proper regard to other plans, policies and strategies relating to the area;
- C2 in that the housing provision strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- C3 in that it does not have regard to the Wales Spatial Plan;
- C4 as it does not have regard to the relevant community strategy;
- CE1 in so far as the proposed housing provision strategy does not flow logically from the proposed strategy of the plan;
- CE2 in that this level of housing is not realistic and appropriate having considered the alternatives and is not founded on a robust and credible evidence base in terms of local need;
- CE4 in that restricting that level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local need and promote future economical growth.

1.5 Accordingly, in order to make the plan sound it is necessary for the Council to increase the housing requirement and to identify a robust and deliverable supply of land for housing. We set out our reasoning in the following paragraphs.

2.0 Factors Underpinning the Housing Requirement

2.1 Para 9.2.1 of Planning Policy Wales (4th edition) indicates that in planning the provision for new housing local authorities must take account of the following:

People, Places, Futures – The Wales Spatial Plan;

Statutory Code of Practice on Racial Equality in Housing – Wales;

The Assembly Government's latest household projections;

Local housing strategies;

Community strategies;

Local housing requirements (needs and demands);

The needs of the local and national economy;

Social considerations (including unmet need);

The capacity of an area in terms of social, environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing;

The environmental implications, including sustainable building standards (see Section 4.11), energy consumption, greenhouse gas emissions and flood risk;

The capacity of the existing or planned infrastructure; and

The need to tackle the causes and consequences of climate change.

2.2 Whilst 9.2.2 indicates that the starting point of assessing housing requirements is the latest Government Household projections but it is very clear that other sources of local evidence should be considered.

"In estimating housing requirements local planning authorities should integrate the provisions of their local housing strategies with the relevant provisions of their development plans".

2.3 PW expressly requires that Local Planning Authorities should consider the appropriateness of the projections for their area based on all sources of evidence including the need for affordable housing identified by their Local Housing Market Assessment (LHMA). I deal with this in more detail below, however it is evident that the LHMA relied upon by Newport is both out of date (published in 2007) and plainly inaccurate in terms of its predictions of how matters would have proceeded over the 5 years following its publication to the present day.

2.4 Based on the Planning Policy Wales requirements, it is evident that having regard to the criteria listed, the Deposit LDP has significant shortcomings in relation not only to national guidance but also other plans, the community strategy, the evidence base, housing need and the Plan's own objective. We consider below the key elements in setting a housing requirement.

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3.0 Strategies and Plans

The Deposits LDP Vision and Objections

3.1 The Deposit LDP Objections clearly set the context for what the policies within the Plan must achieve. Objective 4 seeks to ensure that there is an adequate supply of land for housing which meets the needs of the populations. It explains that the LDP proposes a level of housing that enables everyone to have access to decent housing.

3.2 The primary role of the subsequent policies within the LDP is clearly to help achieve the strategic objectives. It is evident that in this case there are not “cascaded down” into the policies within the Plan that are intended to implement the strategy. Indeed, the approach to housing provision adopted within the Deposit LDP is based on a LHMA (absent an up to date Assessment) that plainly identifies a level of need that is higher than the level of growth proposed and comprises a significant number of sites that have proven undeliverable through the UDP process – such that there remains a residual requirement from the LDP. In that regard the plan clearly cannot achieve its own vision or objectives.

The Wales Spatial Plan (WSP)

3.3 The aspirations for the South East Region are set out in detail in the WSP, in particular the vision for the area is to create “and innovative skilled area offering a high quality of life – international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and Europe, helping to spread prosperity within the area and benefiting other parts of Wales”.

3.4 to adopt a restrictive approach towards housing is fundamentally out of line with the overarching vision for the region and will not contribute towards the achievement of the main priorities identified in the WSP including Promoting a Sustainable Economy.

Local Housing Needs

3.5 The LHMA submitted as evidence in support of the plan does not form a reliable source of evidence. It was published in 2007, five years before the LDP was placed on deposit and included assumptions over the deliverability of housing land between 2006 and 2011 that have proven to be an underestimation of actual delivery.

3.6 Page 27 of the LHMA sets out that the number of net additional dwellings required between 2003 and 2021 is 2010 is 12,100. With 1,210 completed in 2003 to 2006, 3,630 planned between 2006 and 2011 and then a residual requirement of 7260 (726 per annum) over the 10 years between 2011 and 2021. I would note that the LDP plans for 151 dwellings less than this per annum and 1510 dwellings less over all during this period.

3.7 Furthermore, it is possible to update the calculations on behalf of the Council. The Residual target as of 2006 was 10,890 from 2006 to 2021. Minus actual completions between 2006 and 2011 (2,591 rather than 3,630 dwellings anticipated in 2007) equates in a residual requirement between 2011 and 2021 of 8,329 dwellings (832.9 dwellings per annum). Again the LDP provision would be 258 less per annum and 2,579 dwellings less than required over the period to 2021.

3.8 If the LHMA requirement to 2021 was extrapolated forward for the plan period to 2026 then it would equate to 12,494 dwellings required over the plan period. This is significantly more than proposed by the Deposit LDP.

3.9 In the absence of any more up to date Housing Market Assessment this clearly forms a significant consideration, insofar as it is plainly the case that the Council’s housing supply would not meet the requirements set out in their Local Housing Market Assessment, rather there would be a significant shortfall.

3.10 The WG “Homes for Wales” white paper indicates that if they are to be effective, LDP’s require a robust evidence base and as part of this “Local authorities must assess the need for all types of housing, using up to date Local Housing Assessments”. Whilst this is a consultation paper it is clear that LHMA’s contribute towards the evidence base in informing policies and current policies fall short of what is desirable.

Newport Community Strategy

3.11 The Newport Community Strategy sets out the key aspirations for the local community 2010 to 2020. the aim of the strategy is to enhance the quality of life of local communities through actions to improve their economic, social and environmental wellbeing. The Vision is to create a “proud and prosperous city with opportunities for all”. This includes objectives related to create a thriving economy, for people to thrive and live in a safe inclusive economy.

3.12 The approach taken by the Deposit LDP towards housing provision implies that the Community Strategy cannot be achieved. Indeed, the lack of basic provision of housing to meet identified needs can only be considered to be contrary to the fundamental requirements of people and can only harm the implementation of the Community Strategy. As such the LDP can only be considered to be unsound in its current form as it effectively undermines the Community Strategy for the area.

4.1 Social Considerations & Housing Requirements

4.1 The Assembly Government’s vision for housing in Wales, Better Houses for People, is that everyone should have the opportunity to live in good quality, affordable housing; be able to choose where they live; and decide whether buying or renting is best for them and their families.

4.2 In addition to the LHMA, the Local Housing Strategy update (2010) indicates that there are 5,100 households on the waiting list for affordable housing. This level of need equates to significantly more housing (regardless of tenure) than that identified by the LDP.

4.3 The Plan’s strategy should be capable of dealing efficiently with a range of circumstances. By not proposing a housing requirement in line with evidence of housing need, the LDP will not be able to

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deal with the implications of population change, household growth and demand and will not be able to meet the housing needs of its population contrary to Welsh Assembly aspirations and the Deposit LDP Strategy.

4.4 Were the Plan not to provide an adequate level of overall housing provision this would have significant harmful social and economic effects.

4.5 It is a WG objective to tackle social exclusion and to reverse social inequalities. Access to decent housing is at heart of social inclusion. Under provision of housing through the planning system will undermine this. The greatest impact will fall upon low income households and young people looking to become active in the housing market. Under-provision leads to overcrowding, concealed households and poor quality housing and is contrary to the objectives of the Welsh Government to secure social inclusion.

5.0 Local Economic Requirements

5.1 Housing provision forms part of the supporting framework in order to support the Welsh Government's aim to increase employment and local growth. Indeed, the WG Economic Renewal Strategy 2010 sets out the Welsh Government's objectives for helping to shape the future of the Welsh Economy and leading the Country out of recession. The programme sets out a new direction for economic renewal and is based on the understanding that the economy is "simply to dynamic to forecast credibly over the long term". As such the Strategy sets out how the WG (and other levels of Government) can help to "shape the conditions in which a dynamic economy functions, and the role the government and wider public sector can play in encouraging success in the private and third sectors".

5.2 A constrained housing market will have an inflationary impact on land and house prices – which will only exacerbate existing problems. Housing shortages and high prices will limit the ability of labour markets to develop. This will inevitably result in shortages of skilled labour, increasing wage levels and increased long distance commuting. Such problems damage competitiveness, restrict the ability of companies to expand and deter employers from locating in the area and damage employment growth. Jobs will ultimately be lost to other regions in Wales, the UK and Europe.

5.3 It is imperative that the Plan adopts a robust and positive approach to economic growth (and housing provision) so as to avoid the harmful effects that will occur under the present approach and importantly to avoid a continuation of existing trends that sees young local families unable to compete on the housing market due to the influx or retirees from other parts of the United Kingdom.

6.0 Housing Land Supply

6.1 Allied to our objection to the overall level of housing is our objection to the Council's housing land supply estimate which underpins the allocation of new housing land in Policy H1. indeed, PPW is explicit that sites should be identified that are land is genuinely available or will become for development – and importantly sites must be free or readily freed from planning, physical and ownership constraints and economically feasible for development so as to create communities where people want to live.

6.2 There are significant number of sites that the Council envisage will be bought forward in the LDP that were identified within the UDP and remained undeveloped and classified in the latest LHLAS as 3(i). Where constraints exist it is unlikely that such sites will be bought forwards in the LDP period as has historically been the case – this is demonstrated in consecutive Joint Housing Land Availability Studies. This emphasises the importance of ensuring a robust supply of land. I highlight several of those sites below:

1. Unimplemented UDP Sites – subject to constraints (flood risk, remediation etc). (including Glebelands, Herbert Road, Whiteheads and Crindau);
2. High density flat schemes – a number of high density flatted schemes have been mothballed in recent or have under delivered. As such there is little justification for the inclusion of a number of schemes where there is no apparent market interest (including Penmaen Wharf, Newport Athletic Club);
3. Overestimation of delivery – I note at Llanwern that based on the trajectory within the agreed Statement of Common Ground for the 2011 JHLAS, it is estimated that it would deliver 2100 dwellings during the plan period, leaving 1900 dwellings outside of the plan period not c.1000 as envisaged by the Council. In addition, it is indicated that Allt Yr Yn will comprise 200 dwellings, however, planning permission on the site was 129 units;
4. S106 sites – there is no evidence presented to suggest that these sites will actually be bought forward.

6.3 It is our view that based on trends over the UDP period, it is highly unlikely that a number of the identified sites will deliver at the levels that Newport envisage. Should the above categorisations be born out then there would be a shortfall of between 3,000 and 4,000 dwellings on the level envisaged as being appropriate by Council i.e. the WG projection plus the flexibility allowance.

Phasing

6.4 At para 2.38 we note that Newport City Council indicate that many of their brownfield sites had progressed slowly due to the economic recession between 2009 and 2011. Whereas in actual fact, many of the brownfield sites remained undeveloped with no interest or unimplemented planning permissions through the peak of the market in the early to mid 2000's and are still categorised in 3(i) of the JHLAS. Indeed, as a sign of the constrained nature of the housing supply in Newport, the peak rate of completions was 714 in 2001 and fell as low as 340 completions in 2004 and 4252 in 2005 – as generally in the UK the housing market was moving towards its peak.

6.5 The reliance upon phasing within the UDP was proven to be wholly unreliable and cannot be a basis for carrying forward through the LDP. Indeed, the strategy was rather haphazard – when the UDP required 4000 dwellings per annum between 2001 and 2006 they were in fact averaging 508 completions, however, for the final five years the average was significantly below the 740 dwellings required. This resulted in an overarching shortfall of 400 dwellings of the overarching requirement not being provided – this amounts to nearly a years supply of housing not being provided. Clearly this is not acceptable in light of the significant level of housing need identified within the LHMA.

6.6 It is evident that there is no basis for a strategy of phasing in Newport, particularly not when the council should be encouraging high rates of development to meet the unmet requirements of the UDP and the high rates of housing need identified by the LHMA which were also unmet.

Flexibility Allowance

6.7 There should be an element of flexibility in the housing land supply. This is accepted within the Council's existing figures 25% component of any housing land supply estimate to reflect the fact that

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not all sites with planning permission or allocated in the Plan will be developed either in whole or in part within the Plan period. Planning permissions may lapse and sites may be developed for alternative purposes – as has proven to be the case through the UDP. Such as allowance for non implementation is significantly more important when considering the needs within the area and the number of UDP sites that have remained undeveloped due to constraints.

7.0 Conclusion

7.1 In our submission, and having regard to the requirements of a plan-led system and Planning Policy Wales, the Plan should seek to meet the future accommodation needs of its inhabitants which is essential if the City is to thrive as envisaged by the Community Strategy.

7.2 The implications of such a restrictive approach include lack of private sector investment, exacerbation of housing shortages and failure to achieve the key objectives of the LDP. Rather there should be a string element of forward thinking in order to produce a sound Plan to ensure that long term issues are addressed and that needs are met in most sustainable manner. In this context, and having regard to the matters set out herein, adopting a higher growth scenario as a basis for land allocations is essential to produce a sustainable and sound strategy which meet the needs of the County.

8.0 Required Change

8.1 That a housing requirement be set for the County that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. We estimate, based on the available indicators, around 12,494 dwellings. In addition to this figure should be added a 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates.

8.2 In light of identified problems within County in terms of affordability providing to meet estimated housing requirements is essential to ensure an adequate supply of land, retain local families and young people. Constraining supply in these terms would inevitably result in a very unbalanced community profile contrary to the aims and objectives of the LDP.

8.3 Our estimated requirement provision figure for the plan period is 16,100 dwellings. We would hope that the Council will be willing to engage in meaningful discussions with the parties such as ourselves to resolve any technical differences over the assumptions used prior to the Examination.

8.4 Accordingly, additional sites must be allocated in order to meet this shortfall. To that extent the land adjoining Cwrt Camlas Rogerstone is considered acceptable to accommodate some of the required shortfall.

8.5 The supporting Development Framework Document which has been prepared in relation to the land adjoining Cwrt Camlas has summarised the technical reports and information which has been prepared to support the allocation as logical choice for housing approximately 30 dwellings.

8.6 It is evident from the assessments undertaken as past of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 – Countryside and H1 – Housing Site (Allocation) that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

8.7 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at land adjoining Cwrt Camlas within the settlement of Rogerstone is deliverable. In this regard the allocation at land adjoining Cwrt Camlas will assist in providing certainty over delivery and housing supply within the plan period together with alternative range and choice.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination Due to the significant issues raised in the representations	
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Please refer to the attached representation.	
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Item Question

Tick-box reply

6	6	A new policy	Yes
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8	8	Add a new site.	Yes
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Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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321.D3//SP05	Newbridge Ests & John Fmly	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.18

Site: 400/ Cwrt Camlas

Boundary
Change

Policy: SP05

Summary: Propose removal of Countryside designation at Cwrt Camlas

Item Question *Representation Text*

2 2 Policy Number

SP5 Countryside

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

Land adj. to Cwrt Camlas, Rogerstone

Representation Details

Newport City Council Local Development Plan

by: Representation No

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14 14 Representation

Countryside & Settlement Boundary
Page 18
Policy Reference: SP5 – Countryside

1.0 Introduction

1.1 The John Family and Newbridge Estates objects to the inclusion of land adjacent to Cwrt Camlas within the Countryside and the omission from within the settlement Boundary of Rogerstone. The land concerned is shown on the attached plan

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests;

- C2 in that the settlement is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 – Housing Sites it is noted that whilst Newport are utilising the Welsh Government projections the implications of Newport City Council Local Housing Market Assessment have not been fully taken into consideration.

2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within Policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

2.3 In consideration the above the separate Housing submission recommends that a housing requirement be set that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. This has been estimated at a requirement of around 12,494 dwellings. In addition to this it is recommended that an additional 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates should be added. Consequently this generates an estimated requirement provision figure for the plan period of 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

2.4 Therefore, it is evident that appropriate new housing allocation housing site will be required to provide land which is immediately available and within a sustainable location. In this case adjoining Cwrt Camlas would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.5 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.6 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2011 4th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.7 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.8 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.9 The characteristics and location of the site adjoining Cwrt Camlas accords with the relevant criteria in order to provide a sustainable settlement extension:

The site immediately adjoins the settlement boundary of Rogerstone and is subject to urban influences;

The extension of the settlement to provide residential development would be wholly compatible with the neighbouring established land uses;

Development of the site is not considered by physical or environmental issues;

The site is accessible to jobs, shops and services by modes other than the car, and;

The site is located where the capacity of existing and potential infrastructure, are available.

2.10 The principles and criteria are set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site adjoining Cwrt Camlas as a housing allocation site and the consequent inclusion within the settlement boundary of Rogerstone has been prepared.

Representation Details

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321.D4//SP05	Newbridge Ests & John Fmly	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.18

Site: 401/ Cwrt Camlas

Boundary
Change

Policy: SP05

Map: Constraints Plan - West

Summary: Change to settlement bounday

Item Question Representation Text

2 2 Policy Number
SP5 - Countryside

9 9 Amend the boundaries of an existing site. Yes

11 11 Site Name
Land adj to Cwrt Camlas, Rogerstone.

Representation Details

Newport City Council Local Development Plan

by: Representation No

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14 14 Representation

Countryside & Settlement Boundary
Page 18
Policy Reference: SP5 – Countryside

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- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

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2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within Policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

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Planning Policy Wales

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The site is accessible to jobs, shops and services by modes other than the car, and;

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333.D1//SP05	Duthie, Messers R & J	Derek Prosser Associates		29/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.18

Site: 173/333.C1 North-east of Coldra

Boundary
Change

Policy: SP05

Summary: Include site within the settlement boundary

Item Question Representation Text

2 2 Policy Number
SP05 Countryside

7 7 A new paragraph or new text.
To explain the reasoning behind urban boundary

Yes

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

by: Representation No

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14	14	Representation								
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The Plan is clearly unsound as it excludes this modest site of 3.16 acres from the urban area and refers to it as countryside policies pertaining, when it is an isolated area of land which is undeveloped but surrounded by urban development and features. The Plan does not appear to explain the significance of the urban boundary or how it has been defined.

This representation seeks the removal of the site from the protective designation as countryside and its inclusion within an amended urban boundary. It should remain undesignated within the urban boundary or be redesignated as an employment or leisure and sporting facilities use to reflect the development of land to the east and across the A48 to the south.

The site is clearly defined by the A449 dual carriageway to the north and west; a major hotel and a mix of commercial and residential development to the east; and the A48 dual carriageway to the south. To the south of the A48 are also a hotel, restaurant and other commercial activities which are considered to be within the Langstone village area. The A449 has recently been the subject of major works to improve the efficiency of the Coldra Roundabout and in conjunction with the urban development in its immediate vicinity, it has a strong urban feel to it. This western concentration of development at Langstone, closest to the Coldra Roundabout, is strongly defined by the A449 acting as its northern boundary and the M4 acting as its southern boundary. This representation site with the even more modest are known as Coldra Wood, is the only are of such scale between the A449 and the M4 which is not either developed or committed for development.

As ancient woodland, the adjoining Coldra Wood, isolated from the remainder of Coldra Wood by the construction of the A449 dual carriageway, has a strong justification for being retained as amenity land and protected from future development. However, there is not justification for this isolated pair of fields being misleadingly referred to as countryside and protected from future development. It is not open countryside beyond a logical urban boundary.

To the east of the site, north of A48 and south of the A449, the prevailing character is of high quality development in open landscaped settings. This is the style of development which the Council has encouraged alongside the major junction on the M4 corridor over the past 2 decades. Such development displays the dynamics of such a location and such locations are highly prized. They are being exhausted however, and though modest in scale, this is one of few which are left. There is not good planning reason why this site should be excluded from the prospect of being a future development opportunity to compliment those which adjoin the site.

The development of this site would not detract from the setting of the nearby Langstone Village employment or the wider local area. Since the early 1990's development pressures increased substantially resulting in significant changes to the appearance of the area but bringing much needed investment and employment. The requirements of the future are little different with National Government emphasising that local planning authorities need to more readily make appropriate development sites in the short term to kick-start a lethargic economy.

The site sits below the levels of the A48 and A449. strong boundaries made up of mature trees and hedgerows will help to soften the impact of built development as they have done along the road frontages to the adjoining developments. Such features need only be interrupted by access along the A48 frontage, which would ideally be designed on the basis of left in and left out taking advantage of the proximity of roundabout junctions on the A48 to east and west. Such an arrangement maximises visibility along this length of frontage and minimises traffic conflicts to other users of the highway. Development of this site need not harm the trees, hedgerows and ecological features of the site for which mitigation can be arranged.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.								No
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13	13	Test of Soundness C2, C3, CE1, CE2, CE4								
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
333.D2	Duthie, Messers R & J	Derek Prosser Associates		29/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.0

Site: 308/ North East Coldra

New Site

Summary: Site to be included with the plan for Employment or Leisure and Sporting facilities

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP5 Countryside	
7	7	A new paragraph or new text. To explain the reasoning behind urban boundary	Yes
9	9	Amend the boundaries of an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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The Plan is clearly unsound as it excludes this modest site of 3.16 acres from the urban area and refers to it as countryside policies pertaining, when it is an isolated area of land which is undeveloped but surrounded by urban development and features. The Plan does not appear to explain the significance of the urban boundary or how it has been defined.

This representation seeks the removal of the site from the protective designation as countryside and its inclusion within an amended urban boundary. It should remain undesignated within the urban boundary or be redesignated as an employment or leisure and sporting facilities use to reflect the development of land to the east and across the A48 to the south.

The site is clearly defined by the A449 dual carriageway to the north and west; a major hotel and a mix of commercial and residential development to the east; and the A48 dual carriageway to the south. To the south of the A48 are also a hotel, restaurant and other commercial activities which are considered to be within the Langstone village area. The A449 has recently been the subject of major works to improve the efficiency of the Coldra Roundabout and in conjunction with the urban development in its immediate vicinity, it has a strong urban feel to it. This western concentration of development at Langstone, closest to the Coldra Roundabout, is strongly defined by the A449 acting as its northern boundary and the M4 acting as its southern boundary. This representation site with the even more modest are known as Coldra Wood, is the only are of such scale between the A449 and the M4 which is not either developed or committed for development.

As ancient woodland, the adjoining Coldra Wood, isolated from the remainder of Coldra Wood by the construction of the A449 dual carriageway, has a strong justification for being retained as amenity land and protected from future development. However, there is not justification for this isolated pair of fields being misleadingly referred to as countryside and protected from future development. It is not open countryside beyond a logical urban boundary.

To the east of the site, north of A48 and south of the A449, the prevailing character is of high quality development in open landscaped settings. This is the style of development which the Council has encouraged alongside the major junction on the M4 corridor over the past 2 decades. Such development displays the dynamics of such a location and such locations are highly prized. They are being exhausted however, and though modest in scale, this is one of few which are left. There is not good planning reason why this site should be excluded from the prospect of being a future development opportunity to compliment those which adjoin the site.

The development of this site would not detract from the setting of the nearby Langstone Village employment or the wider local area. Since the early 1990's development pressures increased substantially resulting in significant changes to the appearance of the area but bringing much needed investment and employment. The requirements of the future are little different with National Government emphasising that local planning authorities need to more readily make appropriate development sites in the short term to kick-start a lethargic economy.

The site sits below the levels of the A48 and A449. strong boundaries made up of mature trees and hedgerows will help to soften the impact of built development as they have done along the road frontages to the adjoining developments. Such features need only be interrupted by access along the A48 frontage, which would ideally be designed on the basis of left in and left out taking advantage of the proximity of roundabout junctions on the A48 to east and west. Such an arrangement maximises visibility along this length of frontage and minimises traffic conflicts to other users of the highway. Development of this site need not harm the trees, hedgerows and ecological features of the site for which mitigation can be arranged.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.								No
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13	13	Test of Soundness C2, C3, CE1, CE2, CE4								
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D1//SP04	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.17

Policy: SP04

Summary: Supports Policy SP4

Item Question Representation Text

2 2 Policy Number

SP4 Water Resources

14 14 Representation

Policy SP4: Water Resources

This is an important Policy for us as water and sewerage undertake. We are particularly supportive of policies that aim to maximise sustainable options that impact on water supply provision, the disposal of surface & foul discharges and the protection of water quality.

River abstraction and groundwater springs are a vital source, after treatment, of potable water supplies to our domestic and industrial customers. We fully support any measure that is designed to prevent any possible derogation of water resources, as it is almost unthinkable in terms of costs, inconvenience and operational problems if such sources are polluted, contaminated or lost. Our Abstraction Licence covers both water quality and quantity and therefore it is imperative that both are protected.

We welcome any opportunity to reduce and/or eliminate the amount of surface water that drains to our foul sewerage network as this can cause flooding. The use of sustainable practices is fully endorsed as it is unsustainable and uneconomical for us to simply build bigger pipes to accept these flows.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D2//SP11	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.23

Policy: SP11

Summary: Aware of eastern expansion area and working with developers

Item Question Representation Text

2 2 Policy Number
SP11 Eastern Expansion Area

14 14 Representation

Policy SP11: Eastern Expansion Area FOR INFROMATION ONLY

We have been aware of development for some time and are actively working with potential developers in addressing the infrastructure required for such a large area.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D3//SP13	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.25

Policy: SP13

Summary: Supports Policy SP13

Item Question Representation Text

2 2 Policy Number

Policy SP13 Community Infrastructure Levy

14 14 Representation

Policy SP13: Community Infrastructure LevySUPPORT

We fully support this Policy. As a Statutory Water and Sewerage Undertaker, we always try to ensure that sufficient infrastructure exists for domestic developments. However, where such facilities may be deficient, Capital Investment under our 5 years Investment Plans usually remedy the problem. Our planned investment is dictated by our Regulators, Ofwat and Environment Agency in terms of the funding received, the environmental standards and the timing of our planned Regulatory work. Therefore there may be instances where a developers' needs may not coincide with the timing of our planned investment, in particular where "lead in" times are required.

We support the use of Planning Conditions and related Section 106 Agreements of Town & Country Planning Act which may enhance the quality of development and enable proposals to go ahead which might otherwise be refused. There development will create a need for extra facilities, in advance of an Undertaker's Regulatory investment, it may be reasonable for developers to meet or contribute towards the cost of providing such facilities.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D4//GP01	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.36

Policy: GP01

Summary: Supports Policy GP01

Item Question *Representation Text*

2 2 Policy Number

GP1 General Development Principles Climate Change

14 14 Representation

Policy GP1: General Development Principles – Climate Change SUPPORT

The issue of 'urban creep' is an area that needs to be addressed in order to tackle climate change. Permeable areas as part of new and existing development can increase the volume of surface water that enters the public sewerage system leading to flooding. Any policy that is designed to mitigate against this is supported.

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D5//GP03	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.38

Policy: GP03

Summary: Supports Policy GP03

Item Question *Representation Text*

2 2 Policy Number

GP3 General Development Principles Service Infrastructure

14 14 Representation

Policy GP3: General Development Principles Services Infrastructure SUPPORT

We support this Policy. Planning Policy Wales states that the planning system has an important part to play in ensuring the infrastructure on which communities and businesses depend is adequate to accommodate proposed development. The importance of utility services for the promotion of new development and their sustainability is referenced in Chapter 12.

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D6//GP06	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.44

Policy: GP06

Summary: Supports Policy GP6

Item Question Representation Text

2 2 Policy Number
GP06 General Development Principles Quality of Design

14 14 Representation
Policy GP6: General Development Principles Quality of DesignSUPPORT
We would look to your Authority to ensure designs comply with the Code for Sustainable Homes and include relevant water conservation and efficiency facilities.

15 15 Do you want to speak at Public Examination?
Not Ticked Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D7//H01	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Support Policy H1

Item Question Representation Text

2 2 Policy Number
H1 Housing Allocations

3 3 Paragraph or section number(s)

Policy H1: Housing Allocations

For this policy you have kindly provided details of which development sites have the benefit of planning approval, which sites are under construction and which are new allocations. With regards the new allocations referenced H49 to H57, we have already provided representation on these sites to assist you in understanding the potential impact on our assets and the summary of our representation is included in Section 13 Infrastructure Requirement.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D8//EM01	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.73

Policy: EM01

Summary: Supports Policy EM1

Item Question Representation Text

2 2 Policy Number
EM1 Employment Land Allocations

14 14 Representation
Policy EM1: Employment Land Allocations SUPPORT
We have already provided representation on these sites to assist you in understanding the potential impact on our assets and the summary of our representation is included in Section 13 Infrastructure Requirement.

15 15 Do you want to speak at Public Examination?
Not Ticked Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
357.D9//EM02	Dwr Cymru Welsh Water			17/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.77

Policy: EM02

Summary: Supports Policy EM2

Item Question Representation Text

2 2 Policy Number
EM02 Regeneration Sites

14 14 Representation
Policy EM2: Regeneration SitesSUPPORT

We have already provided representation on these sites to assist you in understanding the potential impact on our asset and the summary of our representation is included in Section 13 Infrastructure Requirement.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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447.D1//SP08	Pentrepoeth Action Group			27/05/2012	<input type="checkbox"/>	W	O		M	
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Document:Deposit Plan, p.20

Policy: SP08

Summary: Supports SLA and Countryside allocation around Graig

Item Question Representation Text

14 14 Representation

I support the plan in its entirety especially as it applies to the Graig Ward, with the surrounding countryside continuing to be designated Countryside and Special Landscape Area I would point out that existing housing developments within the Graig Ward, which have been agreed but not yet commenced or completed, will put further pressure on the existing infrastructure as relates to, the local primary and secondary schools which are currently full, the access and egress from the section of the A4072 (Forge Road), between the roundabout at Bassaleg, and the motorway which is already at maximum capacity. This congestion will be further exacerbated by further housing developments northwards on the A467 which is outside the Newport City Council boundary and over which the Newport City Council will have no control.

15 15 Do you want to speak at Public Examination?

Yes

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

447.D2//CF07	Pentrepoeth Action Group			27/05/2012	<input type="checkbox"/>	W	O		M	
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Document:Deposit Plan, p.103

Policy: CF07

Summary: Request the protection in perpetuity of the new allotments at Gloch Wen

Item Question Representation Text

14 14 Representation

I would further comment that the old allotments at Rhiwderin have been granted planning consent for housing and that an area outside the village boundary which was previously designated Countryside and Special Landscape Area has been allocated as an area for replacement allotments. We would request that the newly designated allotments are protected against development and will remain allotments in perpetuity.

15 15 Do you want to speak at Public Examination?

Yes

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
447.D3	Pentrepoeth Action Group			27/05/2012	<input type="checkbox"/>	W	S		M	

Document:Deposit Plan, p.0

Summary: Support the LDP especially in its application to the Graig Ward

Item Question *Representation Text*

14 14 Representation

On the 3rd March 2011 we sent in 100 forms in support of the Newport Local Development Plan 2011 - 2026 We support the plan in its entirety especially as it applies to the Graig Ward, with the surrounding countryside continuing to be designated Countryside and Special Landscape Area We would point out that existing housing developments within the Graig Ward which have been agreed but not yet commenced or completed, will put further pressure on the existing infrastructure as relates to, the local primary and secondary schools which are currently full, the access and egress from the section of the A4072 (Forge Road), between the roundabout at Bassaleg, and the motorway which is already at maximum capacity. This congestion will be further exacerbated by further housing developments northwards on the A467 which is outside the Newport City Council boundary and over which the Newport City Council will have no control. We would further comment that the old allotments at Rhiwderin have been granted planning consent for housing and that an area outside the village boundary which was previously designated Countryside and Special Landscape Area has been allocated as an area for replacement allotments. We would request that the newly designated allotments are protected against development and will remain allotments in perpetuity.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
583.D1//H01.54	Cornelious, Cllr Mrs Margaret			24/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.64

Policy: H01.54

Summary: Supports protection of countryside and SLA around Bassaleg and Rhiwderin preserved, especially the allotments.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number H1	
3	3	Paragraph or section number(s) H01.54	
4	4	The Proposals Map	Yes
11	11	Site Name no	
14	14	Representation I would not like to see the plan altered. I wish to see the oen land around Bassaleg and Rhiwderin preserved. I wish all the open countryside and special landscape areas preserved, especially the allotments	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
694.D1//SP06	Caston, Mr R J			24/05/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.19

Policy: SP06

Summary: Supports Policy SP6

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Answer</i>
2	2	Policy Number SP6	
14	14	Representation I strongly support Policy SP6 re: Rotation of Green Belt and proposed minor extension.	
15	15	Do you want to speak at Public Examination?	No

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Answer</i>
1	1	I think the LDP is sound.	Yes

694.D2//SP08	Caston, Mr R J			24/05/2012	<input type="checkbox"/>	P			M	
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Document:Deposit Plan, p.20

Policy: SP08

Summary: Object to the development of candidate sites within the SLA located to the west of Rhiwderin.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Answer</i>
2	2	Policy Number SP08	
3	3	Paragraph or section number(s) (ii)	
14	14	Representation Special Landscape Areas – specifically area (ii) “West Rhiwderin” – In reality all the countryside bordering the built-up areas of Bassaleg and Rhiwderin. I strongly object to the development of any of the “candidate sites” within the SLA. Development would contravene the objective of policy CE 5 (Environment Spaces, q.v.) In addition, the highway network, both principal and local, is incapable of supporting any further larger scale development.	
15	15	Do you want to speak at Public Examination?	No

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Answer</i>
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
694.D3//T1	Caston, Mr R J			24/04/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.82

Policy: T1

Summary: Supports safeguarding and development of the railway system.

Item Question Representation Text

2 2 Policy Number

T1

14 14 Representation

I strongly support Safeguarding and Development of the Railway system, in particular;
 (i) with refernce to a new station at Pye Corner, Bassaleg.
 (ii) the provision of services from the Ebbw Valley to Newport.
 and generally the several proposals listed.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
694.D4//CF07	Caston, Mr R J			24/05/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.103

Policy: CF07

Summary: Supports Policy CF07

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Answer</i>
2 2	Policy Number	CF07	
14 14	Representation	I strongly support the proposals for: CF7) Allotments Whereby they may not be re-developed without provision of replacements	
15 15	Do you want to speak at Public Examination?		No

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Answer</i>
1 1	I think the LDP is sound.		Yes

694.D5//CF13	Caston, Mr R J			24/05/2012	<input type="checkbox"/>	P			M	
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Document:Deposit Plan, p.108

Policy: CF13

Summary: Support Policy CF13

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Answer</i>
2 2	Policy Number	CF13	
14 14	Representation	CF13) Community facilities whereby they may not be re-developed without provision of facilities.	
15 15	Do you want to speak at Public Examination?		No

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Answer</i>
1 1	I think the LDP is sound.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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694.D6//H01.54	Caston, Mr R J			24/05/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: DLD

Document: Deposit Plan, p.64

Site: 440/ Former Alcan Site

Delete Site

Policy: H01.54

Summary: Reservations regarding development of former Alcan site on traffic management grounds.

Item Question Representation Text

2 2 Policy Number
H54

14 14 Representation

I have strong reservations re development of the former Alcan site (estimated 700 housing units) on traffic management grounds. Peak period traffic congestion on the A467/A468 and around junction 28 of the M4 is already bad and can only be exacerbated by this proposal without some form of alleviation.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

742.D1	Smith, G D			27/05/2012	<input type="checkbox"/>	W			M	
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Document: Deposit Plan, p.0

Summary: Concern regarding WG overturning decisions made by NCC

Item Question Representation Text

14 14 Representation

I do not wish to comment on any part of the plan in detail. Overall, I believe it to be sound, sensible, deliverable and good for the City. My only concern is that the W.A.G. has the power to over ride planning decisions made by Newport City Council (Former Tredegar Park Golf Club, Rhiwderin Allotments, to name but two cases) - so are they going to ride roughshod over this plan when it suits them?

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1008.D1//SP07	Killick, Kay			28/05/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.19

Policy: SP07

Summary: Support redevelopment on brownfield sites. Opposes further development in the Rhiwederin area.

Item Question Representation Text

14 14 Representation

I approve of the plan and the council's intention to use brownfield sites for development. I do not wish to see any further building in the Bassaleg and rhiwderin area. The schools are full to capacity and Forge Road regularly congested.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1117.D1//SP08	Herbert, Richard	Boyer Planning	- Cardiff	28/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.20

Site: 338/ Llwynhaid Farm

Boundary
Change

Policy: SP08

Map: Constraints Plan - West

Summary: Objects to allocation of site under Policy SP8 Special Landscape Area

Item Question Representation Text

2 2 Policy Number

SP08 - Special Landscapes Areas

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

Land at Llwynhaid, Bettws

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
14 14	Representation									
Policy Reference: SP8 - Special Landscape Areas										
1.0 Introduction										
1.1 R A I Herbert objects to the inclusion of land at Llwynhaid within the North of Bettws Special Landscape Area designation. The land concerned is shown on the attached plan.										
1.2 Inclusion of this land within the North of Bettws Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests:										
- CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;										
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and										
- CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.										
2.0 Amplification										
LANDMAP Designation										
2.1 In terms of the evidence base for the designation of the Special Landscape Areas (SLA) as referred to in the Deposit Plan there are a number of issues which need to be addressed.										
2.2 Firstly the use of the LANDMAP information system in determining potential SLAs within Newport is driven by Planning Policy Wales (2011 4th Ed) in which Paragraph 5.3.13 states that LANDMAP "...can help to inform supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design)".										
2.3 However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst										
Planning Policy Wales states that the data should 'help to inform' supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.										
2.4 In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP										
Information Guidance Note 1 is 'coherence.' This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of a distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.										
2.5 Concern is also raised in relation to the definition of boundaries. The TACP £ Report - Designation of Special Landscape Areas (2009), which is appended to the Background Paper, highlighted the need for the subsequent										
confirmation of the detailed boundaries by the Authority.										
2.6 In this regard paragraph 5.2 of the SLA Background Paper states that "The proposed SLA boundaries for the LDP are justified as being located either: along Newport Authority's administrative boundary, the proposed settlement boundary from the LDP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous".										
2.7 However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach they Authority have defaulted to the use of the settlement boundaries. While in some instances edge of settlement may be justified as the boundary in special landscape terms, in the majority of cases, it appears to be used without regard to landscape quality and adjoining influences.										
2.8 We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries so as to include only those landscapes worthy of protection by virtue of their special status.										
3.0 Special Landscape Area Boundary										
3.1 Given the above comments on the LANDMAP assessment and subsequent definition of the boundaries proposed by the Authority it is also important to highlight that although only the northern section of the site is located within the North of Bettws Special Landscape Area it is also the area which adjoins the settlement boundary of Bettws at Ogmore Crescent and Derwent Court to the north and is subject to urban and human influences including residential dwellings, parking areas, garages and public footpaths.										
3.2 In considering the site characteristics it is evident that a more detailed assessment of the boundaries should be undertaken rather than default to the settlement boundary. This is particularly relevant given that as part of the										
Newport UDP Inquiry it was recommended by the Inspector that the Special Landscape Area in which the site is located should be deleted as insufficient information had been provided.										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<p>3.3 It was also agreed by the UDP Inspector previously that the site is well contained both physically and visually. Within the UDP Inspectors Report it was highlighted that the site itself is not widely visible and in the limited local views in which it features it is seen in the context of the built up area of Bettws. It is therefore considered that the site is located with a clearly defensible boundary and should form a logical settlement extension.</p> <p>3.4 Further details relating to the site characteristics are provided within the supporting Development Framework Document which illustrates the acceptability of the site for residential development.</p> <p>4.0 Required Change:</p> <p>4.1 That the site at Llwynhaid be removed from the North of Bettws Special Landscape Area.</p>										
15	15	Do you want to speak at Public Examination?							Yes	
16	16	Subject to speak on at Examination								
<p>Due to significant issues raised in the representations.</p>										
<p><i>Item Question</i> <i>Soundness Test</i></p>										
1	1	I think the LDP is sound.							No	
13	13	Test of Soundness								
<p>CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;</p> <ul style="list-style-type: none"> - CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and - CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances. 										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1117.D2//SP05	Herbert, Richard	Boyer Planning	- Cardiff	28/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.18

Site: 339/ Llwynhaid Farm

Boundary
Change

Policy: SP05

Map: Constraints Plan - West

Summary: Objects to allocation at countryside under Policy SP5 Countryside

Item Question Representation Text

2 2 Policy Number
SP5 - Countryside

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name
Land at Llwynhaid, Bettws

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Page: 18

Policy Reference: SP5 - Countryside

1.0 Introduction

1.1 R A I Herbert objects to the inclusion of land at Llwynhaid from within the Countryside and the omission from within the settlement Boundary of Bettws. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests: C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0

2.1

Amplification

Housing Requirement

As detailed within the separate submission made in relation to Policy H1 - Housing Sites it is noted that whilst Newport are utilising the Welsh Government projections the implications of the Newport City Council Local Housing Market Assessment have not been fully taken into consideration.

2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

2.3 In considering the above the separate Housing submission recommends that a housing requirement be set that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. This has been estimated at a requirement of around 12,494 dwellings. In addition to this it is recommended that an additional 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates should be added. Consequently this generates an estimated requirement provision figure for the plan period of 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

2.4 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Bettws to incorporate the site at Llwynhaid would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.5 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.6 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2011

4th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.7 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.8 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.9 The characteristics and location of the site at Llwynhaid accords with the relevant criteria in order to provide a sustainable settlement extension:

- The site immediately adjoins the settlement boundary of Bettws and is subject to urban influences;
- The extension of the settlement to provide residential development would be wholly compatible with the with neighbouring established land uses;
- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car, and
- The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available

2.10 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at Llwynhaid as a housing allocation site and the consequent inclusion within the settlement boundary of Bettws has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
	sustainable settlement location. 4.0 Required Change: 4.1 That the site at Llwynhaid be removed from the Countryside and the settlement boundary for Bettws be amended to include land to the as shown on the attached plan									

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?							Yes	
16	16	Subject to speak on at Examination Due to the significant issues raised in the representations.								

Item Question *Soundness Test*

1	1	I think the LDP is sound.							No	
13	13	Test of Soundness C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales; CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.								

Item Question

Tick-box reply

8	8	Add a new site.							Yes	
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1117.D3//H16.01	Herbert, Richard	Boyer Planning	- Cardiff	28/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 407/ Yew Tree Cottage

Delete Site

Policy: H16.01

Summary: Objects to allocation of site as Gypsy and Traveller site

Item Question *Representation Text*

2 2 Policy Number

H16 - Gypsy and Traveller Residential Accomodation - (i) yew Tree Cottage, Bettws

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
14 14	Representation									
<p>Gypsy and Travellers Page: 72 Policy Reference: H16 - Gypsy and Traveller Residential Accommodation</p> <p>1.0 Introduction</p> <p>1.1 R A .I Herbert and Mr & Mrs G Goldsworthy object to the allocation of a permanent Gypsy and Traveller site at (i) Yew Tree Cottage, Bettws.</p> <p>1.2 Inclusion of this land within the Countryside and the North of Bettws Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests of soundness: C2 in that the allocation of a permanent Gypsy and Traveller site outside of the settlement boundary is not compliant with national policy as set out in WAG Circular 30/2007 and Planning Policy Wales; and CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base.</p> <p>2.0 Amplification</p> <p>2.1 Paragraph 9.2.21 of Planning Policy Wales (2011 4th Ed) states that "Local authorities are required to assess the accommodation needs of Gypsy families. It is therefore important that local planning authorities have policies for the provision of Gypsy sites in their development plans".</p> <p>2.2 Whilst it is not disagreed that sufficient provision should be provided it is important that it is within a suitable and sustainable location. Therefore, when assessing the location of Gypsy and Traveller sites regard should be had to the guidance contained within WAG Circular 30/2007 - Planning for Gypsy and Traveller Caravan Sites. Paragraph 20 outlines that "In deciding where to provide for Gypsy and Traveller sites, local planning authorities should first consider locations in or near existing settlements with access to local services e.g., shops, doctors, schools, employment, leisure and recreation opportunities, churches and other religious establishments".</p> <p>2.3 Given that the allocation for the site would effectively allow Gypsy and Traveller to reside in designated Countryside (Policy SP5) regard should also be had to the principles of identifying sites to be allocated for housing in development plans as set out within Paragraph 9.2.8. It states that local planning authorities should follow a search sequence, starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links. The same principle should be utilised for Gypsy and Traveller accommodation allocations.</p> <p>2.4 It is considered that the allocation of the site at Yew Tree Cottage, Bettws, does not take account of the above guidance and it is an isolated site significantly separated from the settlement of Bettws and without significant infrastructure.</p> <p>2.5 Furthermore the Authority should also consider Paragraph 22 of the WAG Circular given that it highlights that "Some Gypsies and Travellers run their businesses from the site on which their caravans are stationed. Local planning authorities may identify in their LDPs, Gypsy and Traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and their children, and neighbouring residents. If mixed sites are not practicable, authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another".</p> <p>2.6 There is no indication from Newport as to the acceptability of a mixed use allocation, and given the site's location within the countryside any business use should be strictly controlled. As detailed above it would be more beneficial to relocate the allocation site within the settlement where separate sites for residential and for business purposes are in close proximity to one another.</p> <p>2.7 Furthermore we note at Policy SP5 - Countryside restricts development to that where the use is appropriate in the countryside, respects and enhances the landscape character and biodiversity and is appropriate in design and scale. It is considered that given the Authority's own restrictive stance on development in the countryside the allocation of Gypsy and Traveller accommodation would be counter to the requirements of appropriate use, respecting and enhancing the landscape character and biodiversity. As no details are provided over the actual size and number of caravans proposed it is difficult to comment as to the scale and design.</p> <p>3.0 Required Change</p> <p>3.1 That the Gypsy and Traveller allocation at Yew Tree Cottage, Bettws be removed and relocated to a more sustainable location within a settlement boundary.</p>										
15 15	Do you want to speak at Public Examination?				Yes					
16 16	Subject to speak on at Examination									
<p>Due to significant issues raised in the representations.</p>										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1117.D4//H01	Herbert, Richard	Boyer Planning		28/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Objection to Policy H1 (Numbers)

Item Question *Representation Text*

2 2 Policy Number

H1 - housing Sites (Numbers)

11 11 Site Name

land at Ilwynhaid, Bettws

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

HOUSING REQUIREMENT

Page: 62

Policy Reference: Policy H1 Housing

1.1 On behalf of R A I Herbert we object to the approach taken by the Deposit LDP with regards to the housing requirement.

1.2 We consider the approach taken by the Council against the requirements of Planning Policy Wales (PPW), which sets out criteria that Local Authorities must take account of when setting their housing requirement. Whilst the Authority has used the WG projections as their starting point, they plainly ignore the implications of the Local Housing Market Assessment that they have submitted as part of their evidence base which when based on up to date information and extrapolated forward indicates a much higher level of need than provided for.

1.3 We also consider that it is inappropriate to rely upon a number of the sites identified within policy H1 that are subject to numerous constraints and have remained undeliverable for some time. A number of such sites are identified as "new allocations" whereas in reality they have been carried through previous plans with no developer interest or signs of such interest.

1.4 In this context and based on our consideration of the Plan in relation to National Policy requirements, it is our view that the housing requirement is wholly inadequate and contrary to the following tests of soundness:

C1 in that it does not have proper regard to other plans, policies and strategies relating to the area;

- C2 in that the housing provision strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

- C3 in that it does not have regard to the Wales Spatial Plan;

- C4 as it does not have regard to the relevant community strategy;

- CE1 in so far as the proposed housing provision strategy does not flow logically from the proposed strategy of the plan;

- CE2 in that this level of housing is not realistic and appropriate having considered the alternatives and is not founded on a robust and credible evidence base in terms of local need;

- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local needs and promote future economic growth.

1.5 Accordingly, in order to make the plan sound it is necessary for the Council to increase the housing requirement and to identify a robust and deliverable supply of land for housing. We set out our reasoning in the following paragraphs.

2.0 Factors Underpinning the Housing Requirement

2.1 Para 9.2.1 of Planning Policy Wales (4th edition) indicates that in planning the provision for new housing local authorities must take account of the following:

People, Places, Futures - The Wales Spatial Plan;

Statutory Code of Practice on Racial Equality in Housing - Wales;

the Assembly Government's latest household projections;

local housing strategies;

community strategies;

local housing requirements (needs and demands);

the needs of the local and national economy;

social considerations (including unmet need);

the capacity of an area in terms of social, environmental and cultural

factors (including consideration of the Welsh language) to

accommodate more housing;

the environmental implications, including sustainable building

standards (see Section 4.11), energy consumption, greenhouse gas

emissions and flood risk;

the capacity of the existing or planned infrastructure; and

the need to tackle the causes and consequences of climate change.

2.2 Whilst 9.2.2 indicates that the starting point for assessing housing requirements is the latest Government Household projections but it is very clear that other sources of local evidence should be considered. "In estimating housing requirements local planning authorities should integrate the provisions of their local housing strategies with the relevant provisions of their development plans".

2.3 PW expressly requires that Local Planning Authorities should consider the appropriateness of the projections for their area based on all sources of evidence including the need for affordable housing identified by their Local

Housing Market Assessment (LHMA). I deal with this in more detail below, however, it is evident that the LHMA relied upon by Newport is both out of date (published in 2007) and plainly inaccurate in terms of its predictions of

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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how matters would have proceeded over the 5 years following its publication to the present day.

2.4 Based on the Planning Policy Wales requirements, it is evident that having regards to the criteria listed, the Deposit LDP has significant shortcomings in relation not only to national guidance but also other plans, the community strategy, the evidence base, housing need and the Plan's own objective. We consider below the key elements in setting a housing requirement.

3.0 Strategies and Plans

The Deposit LDP Vision and Objectives

3.1 The Deposit LDP Objectives clearly set the context for what the policies within the Plan must achieve. Objective 4 seeks to ensure that there is an adequate supply of land for housing which meets the needs of the populations. It explains that the LDP proposes a level of housing that enables everyone to have access to decent housing.

3.2 The primary role of the subsequent policies within the LDP is clearly to help achieve the strategic objectives. It is evident that in this case these are not "cascaded down" into the policies within the Plan that are intended to

implement the strategy. Indeed, the approach to housing provision adopted within the Deposit LDP is based on a LHMA (absent an up to date Assessment) that plainly identifies a level of need that is higher than the level of growth proposed and comprises a significant number of sites that have proven undeliverable through the UDP process - such that there remains a residual requirement from the LDP. In that regard the plan clearly cannot achieve its own vision or objectives.

The Wales Spatial Plan (WSP)

3.3 The aspirations for the South East Region are set out in detail in the WSP, in particular the vision for the area is to create "an innovative skilled area offering a high quality of life - international yet distinctively Welsh. It

will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and Europe, helping to spread prosperity within the area and benefiting other parts of Wales."

3.4 To adopt a restrictive approach towards housing is fundamentally out of line with the overarching vision for the region and will not contribute towards the achievement of the main priorities identified in the WSP including Promoting a Sustainable Economy.

Local Housing needs

3.5 The LHMA submitted as evidence in support of the plan does not form a reliable source of evidence. It was published in 2007, five years before the LDP was placed on deposit and included assumptions over the deliverability of housing land between 2006 and 2011 that have proven to be an underestimation of actual delivery.

3.6 Page 27 of the LHMA sets out that the number of net additional dwellings required between 2003 and 2021 is 12,100. With 1,210 completed in 2003 to 2006, 3,630 planned between 2006 and 2011 and then a residual requirement of 7260 (726 per annum) over the 10 years between 2011 and 2021. I would note that the LDP plans for 151 dwellings less than this per annum and 1510 dwellings less over all during this period.

3.7 Furthermore, it is possible to update the calculations on behalf of the Council. The Residual target as of 2006 was 10,890 from 2006 to 2021. Minus actual completions between 2006 and 2011 (2,561 rather than 3,630 dwellings anticipated in 2007) equates in a residual requirement between 2011 and 2021 of 8,329 dwellings (832.9 dwellings per annum). Again the LDP provision would be 258 less per annum and 2,579 dwellings less than required over the period to 2021.

3.8 If the LHMA requirement to 2021 was extrapolated forward for the plan period to 2026 then it would equate to 12,494 dwellings required over the plan period. This is significantly more than proposed by the Deposit LDP.

3.9 In the absence of any more up to date Housing Market Assessment this clearly forms a significant consideration, insofar as it is plainly the case that the Council's housing supply would not meet the requirements set out in their Local Housing Market Assessment, rather there would be a significant shortfall.

3.10 The WG "Homes for Wales" white paper indicates that if they are to be effective, LDP's require a robust evidence base and as part of this "Local authorities must assess the need for all types of housing, using up-to-date Local Housing Market Assessments." Whilst this is a consultation paper it is clear that LHMA's contribute towards the evidence base in informing policies and current policies fall short of what is desirable.

Newport Community Strategy

3.11 The Newport Community Strategy sets out the key aspirations for the local community 2010 to 2020. The aim of the strategy is to enhance the quality of life of local communities through actions to improve their economic, social and environmental wellbeing. The Vision is to create a "proud and prosperous city with opportunities for all". This includes objectives related to create a thriving economy, for people to thrive and live in a safe and inclusive economy.

3.12 The approach taken by the Deposit LDP towards housing provision implies that the Community Strategy cannot be achieved. Indeed, the lack of basic provision of housing to meet identified needs can only be considered to be contrary to the fundamental requirements of people and can only harm the implementation of the Community Strategy. As such the LDP can only be considered to be unsound in its current form as it effectively undermines the Community Strategy for the area.

4.1 Social Considerations & Housing Requirements

4.1 The Assembly Government's vision for housing in Wales, Better Homes for People, is that everyone should have the opportunity to live in good quality, affordable housing; be able to choose where

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they live; and decide whether buying or renting is best for them and their families.

4.2 In addition to the LHMA, the Local Housing Strategy update (2010) indicates that there are 5,100 households on the waiting list for affordable housing. This level of need equates to significantly more housing (regardless of tenure) than that identified by the LDP.

4.3 The Plan's strategy should be capable of dealing efficiently with a range of circumstances. By not proposing a housing requirement in line with evidence of housing need, the LDP will not be able to deal with the implications of

population change, household growth and demand and will not be able to meet the housing needs of its population contrary to Welsh Assembly aspirations and the Deposit LDP Strategy.

4.4 Were the Plan not to provide an adequate level of overall housing provision this would have significant harmful social and economic effects.

4.5 It is a WG objective to tackle social exclusion and to reverse social inequalities. Access to decent housing is at the heart of social inclusion. Under provision of housing through the planning system will undermine this. The greatest impact will fall upon low income households and young people looking to become active in the housing market. Under-provision leads to overcrowding, concealed households and poor quality housing and is contrary

to the objectives of the Welsh Government to secure social inclusion.

5.0 Local Economic requirements

5.1 Housing provision forms part of the supporting framework in order to support the Welsh Government's aim to increase employment and local growth. Indeed, the WG Economic Renewal Strategy 2010 sets out the Welsh

Government's objectives for helping to shape the future of the Welsh Economy and leading the Country out of recession. The programme sets out a new direction for economic renewal and is based on the understanding that

the economy is "simply to dynamic to forecast credibly over the long term". As such the Strategy sets out how the WG (and other levels of Government) can help to "shape the conditions in which a dynamic economy functions, and the role the government and wider public sector can play in encouraging success in the private and third sectors".

5.2 A constrained housing market will have an inflationary impact on land and house prices - which will only exacerbate existing problems. Housing shortages and high prices will limit the ability of labour markets to develop.

This will inevitably result in shortages of skilled labour, increasing wage levels and increased long distance commuting. Such problems damage competitiveness, restrict the ability of companies to expand and deter employers from locating in the area and damage employment growth. Jobs will ultimately be lost to other regions in Wales, the UK and to Europe.

5.3 It is imperative that the Plan adopts a robust and positive approach to economic growth (and housing provision) so as to avoid the harmful effects that will occur under the present approach and importantly to avoid a continuation of existing trends that sees young local families unable to compete on the housing market due to the influx of retirees from other parts of the United Kingdom.

6.0 Housing Land Supply

6.1 Allied to our objection to the overall level of housing is our objection to the Council's housing land supply estimate which underpins the allocation of new housing land in Policy H1. Indeed, PPW is explicit that sites should be identified that are land is genuinely available or will become available for development - and importantly sites must be free or readily freed from planning, physical and ownership constraints and economically feasible for development so as to create communities where people want to live.

6.2 There are a significant number of sites that the Council envisage will be brought forward in the LDP that were identified within the UDP and remained undeveloped and classified in the latest JHLAS as 3(i). Where constraints

exist it is unlikely that such sites will be brought forward in the LDP period as has historically been the case - this is demonstrated in consecutive Joint Housing Land Availability Studies. This emphasises the importance of

ensuring a robust supply of land. I highlight several of those sites below:

1. Unimplemented UDP Sites - subject to constraints (flood risk, remediation etc), (including Glebelands, Herbert Road, Whiteheads and Crindau);

2. High density flat schemes - a number of high density flatted schemes have been mothballed in recent years or have under delivered. As such there is little justification for the inclusion of a number of schemes where there is no

apparent market interest (including Penmaen Whard, Newport Athletic Club);

3. Overestimation of delivery - I note at Llanwern that based on the trajectory within the agreed Statement of Common Ground for the 2011 JHLAS, it is estimated that it would deliver 2100 dwellings during the plan period, leaving 1900 dwellings outside of the plan period not c.1000 as envisaged by the Council. In addition, it is indicated that Allt Yr Yn will comprise 200 dwellings, however, planning permission on the site was 129 units;

4. S106 sites - there is no evidence presented to suggest that these sites will actually be brought forward.

6.3 It is our view that based on trends over the UDP period, it is highly unlikely that a number of the identified sites will deliver at the levels that Newport envisage. Should the above categorisations be born out then there would be a shortfall of between 3,000 and 4,000 dwellings on the level envisaged as being appropriate by Council i.e the WG projection plus the flexibility allowance.

Phasing

6.4 At para 2.38 we note that Newport CC indicate that many of their brownfield sites had progressed slowly due to the economic recession between 2009 and 2011. Whereas in actual fact, many of the Brownfield sites remained

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		undeveloped with no interest or unimplemented planning permissions through the peak of the market in the early to mid 2000's and are still categorised in 3(i) of the JHLAS. Indeed, as a sign of the constrained nature of the housing supply in Newport, the peak rate of completions was 714 in 2001 and fell as low as 340 completions in 2004 and 425 in 2005 - as generally in the UK the housing market was moving towards its peak.								
		6.5 The reliance upon phasing within the UDP was proven to be wholly unreliable and cannot be a basis for carrying forward through the LDP. Indeed, the strategy was rather haphazard - when the UDP required 400 dwellings per annum between 2001 and 2006 they were in fact averaging 508 completions, however, for the final five years the average was significantly below the 740 dwellings required. This resulted in an overarching shortfall of 400 dwellings of the overarching requirement not being provided - this amounts to nearly a years supply of housing not being provided. Clearly this is not acceptable in light of the significant level of housing need identified within the LHMA.								
		6.6 It is evident that there is no basis for a strategy of phasing in Newport, particularly not when the council should be encouraging high rates of development to meet the unmet requirements of the UDP and the high levels of housing need identified by the LHMA which were also unmet.								
		Flexibility Allowance								
		6.7 There should be an element of flexibility in the housing land supply. This is accepted within the Council's existing figures 25% component of any housing land supply estimate to reflect the fact that not all sites with planning permission or allocated in the Plan will be developed either in whole or in part within the Plan period. Planning permissions may lapse and sites may be developed for alternative purposes - as has proven to be the case through the UDP. Such an allowance for non implementation is significantly more important when considering the needs within the area and the number of UDP sites that have remained undeveloped due to constraints.								
		7.0 Conclusion								
		7.1 In our submission, and having regard to the requirements of a plan-led system and Planning Policy Wales, the Plan should seek to meet the future accommodation needs of its inhabitants which is essential if the City is to thrive as envisaged by the Community Strategy.								
		7.2 The implications of such a restrictive approach include lack of private sector investment, exacerbation of housing shortages and failure to achieve the key objectives of the LDP. Rather there should be a strong element of forward thinking in order to produce a sound Plan to ensure that long term issues are addressed and that needs are met in the most sustainable manner. In this context, and having regard to the matters set out herein, adopting a higher growth scenario as a basis for land allocations is essential to produce a sustainable and sound strategy which meets the needs of the County.								
		8.0 Required Change								
		8.1 That a housing requirement be set for the County that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. We estimate, based on the available indicators, around 12,494 dwellings. In addition to this figure should be added a 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates.								
		8.2 In light of the identified problems within County in terms of affordability providing to meet estimated housing requirements is essential to ensure an adequate supply of land, retain local families and young people. Constraining supply in these terms would inevitably result in a very unbalanced community profile contrary to the aims and objectives of the LDP.								
		8.3 Our estimated requirement provision figure for the plan period is 16,100 dwellings. We would hope that the Council will be willing to engage in meaningful discussions with parties such as ourselves to resolve any technical differences over the assumptions used prior to the Examination.								
		8.4 Accordingly, additional sites must be allocated in order to meet this shortfall. To that extent the land at Llwynhaid, Bettws is considered acceptable to accommodate some of the required shortfall.								
		8.5 The supporting Development Framework Document which has been prepared in relation to Llwynhaid has summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 200 dwellings.								
		8.6 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP8 - Special Landscape Areas, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.								
		8.7 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at Llwynhaid within the settlement of Bettws is deliverable. In this regard the allocation at Llwynhaid will assist in providing certainty over delivery and housing supply within the plan period together with alternative range and choice.								
15	15	Do you want to speak at Public Examination?							Yes	
16	16	Subject to speak on at Examination Due to significant issues raised in the representations.								

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1117.D5//H01	Herbert, Richard	Boyer Planning	- Cardiff	28/06/2012	<input type="checkbox"/>	P	O		M	
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Additional material submitted

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 286/ Llwynhaid Farm

New Site

Policy: H01

Summary: Allocate site at Llwynhaid Farm as a housing allocation

Item Question Representation Text

2 2 Policy Number

H1 - Housing Sites (Allocations)

11 11 Site Name

Land at Llwynhaid, Bettws

Representation Details

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14 14 Representation

HOUSING ALLOCATION

Page: 62

Policy Reference: Policy H1 Housing

1.0 Introduction

1.1 R A I Herbert objects to the omission of the land Llwynhaid as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:

- C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

- CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The irregular shaped 15.53ha site is situated to the southwest of Bettws, immediately adjoining the settlement boundary and existing urban edge. The site mainly comprises a number of fields as well as Llwynhaid farmyard containing farm sheds, a small stable block, and two traditional stone-built farmhouse buildings. The site is crossed by Henllys Lane and Bettws Brook in east/west direction and by Parc-y-Brain Road in a north/south direction.

2.2 To the north the site is bound by the existing residential development and associated infrastructure at Ogmor Crescent and Derwent Court, and the southern boundary is defined by the adjoining woodland which also forms part of the eastern and western boundary. The site is clearly contained by both physical and natural boundaries.

2.3 The site is located in close proximity to the centre of Bettws where there are a number of local shops, including Spar shop, post office, health centre, chemist, dental surgery and hairdresser which are within close proximity. Furthermore, Monnow Primary School is approximately 400m away and Bettws Secondary School within 1.5km of the site. Bettws also has a number of sports grounds, playing fields and a leisure centre (active living centre).

2.4 Regular bus services, typically 20 minute frequency, to and from Newport running along Monnow Way are within 400 metres of the site.

3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

Housing Requirement

3.2 As detailed within the separate submissions made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated site as well as the requirement to meet local needs as set out within the Local Housing Market Assessment a more appropriate requirement provision figure for the plan period would be 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at Llwynhaid would actively assist in providing a deliverable housing site to address the identified shortfall.

Settlement Boundary

3.4 As detailed within separate representations made on Policy SP5 - Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Bettws. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

Special Landscape Area

3.5 Within separate representations made in relation to Policy SP8 - Special Landscape Areas it is recommended that the site be removed from the North of Bettws Special Landscape Area and that the boundaries be revised given the sites characteristics and suitability for development.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at Llwynhaid.

4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 200 dwellings. It is therefore evident that the development of the site will seek to meet the housing need through the Development Plan period within the sustainable settlement location.

5.0 Required Change

5.1 That the land at Llwynhaid, Bettws is allocated for housing development within Policy H1 as a new site for 200 dwellings in order to meet the needs of the local community.

Additional Information Submitted - Available on Request

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15 15	Do you want to speak at Public Examination?		Yes							
16 16	Subject to speak on at Examination Due to the significant issues raised in the representations.									
<i>Item Question</i>		<i>Soundness Test</i>								
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales; - CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and - CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.									
<i>Item Question</i>		<i>Tick-box reply</i>								
8 8	Add a new site.		Yes							
1199.D1	Giles, Cllr Gail			12/06/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.0

Summary: Concern that further development in Caerleon would cause further congestion, air pollution, and loss of open space.

<i>Item Question</i>	<i>Representation Text</i>									
14 14	Representation Thank you for attended the recent meeting in Caerleon Town Hall. You will have noted the high turn out by residents and the depth of feeling against any further development in Caerleon and its associated increase in traffic, air pollution and loss of our very limited supply of open spaces. All these issues undermine the quality of life for those living in Caerleon, particularly the centre of the town. In my previous submissions I have clearly agreed with these concerns and would like my objections re-submitted.									
15 15	Do you want to speak at Public Examination?		Neither							
<i>Item Question</i>		<i>Soundness Test</i>								
1 1	I think the LDP is sound.		Neither							

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1199.D2//H01	Giles, Cllr Gail				<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Supports Policy H1

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1 Pages 62 - 65	
14	14	Representation I have noted the high attendance at the Council's LDP Public meetings in Caerleon. Residents are very concerned about any further development in Caerleon due to any associated increase in traffic, air pollution and loss of our very limited supply of open spaces. All these issues undermine the quality of life in Caerleon, particularly in the town centre. With this in mind I would like to SUPPORT Policy H1 of the plan for not including the many candidate sites in and around the town of Caerleon as development allocations. I would also like to raise concerns about the Allocation of Mill Street (H1 (49)). I do not support the inclusion of the Mill Street site for the reasons already set out i.e over development, loss of open space, additional traffic and associated air pollution, traffic and parking problems. I also believe there may be issues in relation to access and egress etc. My previous submissions under the Candidate Sites Consultation are set out below and I would like these comments to be taken into account as the plan is taken forward to adoption. 1. Caerleon has ancient and very limited infrastructure which includes a one way system , thus bringing nearly all traffic through High Street, Mill Street and across Caerleon Bridge 2. Unacceptable, toxic levels of pollution have already been identified in High Street. More development = more traffic= more pollution which increases the health risks to residents in particular 3. Caerleon has very little open space- no public park, very little access to the riverside (other than the new cycleway) or surrounding countryside 4. Caerleon is an internationally renowned historic site and described as the jewel in Newport's crown. Tens of thousands of tourists visit each year. 5. Caerleon already suffers from over development, excessive speeding traffic, parking problems, narrow pavements, heavy lorries and HGVs, 6. Caerleon is situated on a flood plane 7. The river Usk is a SSSI 8. Further developments contradict the aim of sustainability 9. Development of any of the proposed candidate sites has the potential to damage Caerleon's environment because of increased traffic, loss of open space & green field areas, effects on the flood plane and reduction of quality of life for the present residents. 10. A sustainability and traffic study must be undertaken, including a detailed assessment of air quality 11. Protecting and improving Caerleon's environment should be the priority.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

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1199.D3//H01.49	Giles, Cllr Gail			11/06/2012	<input type="checkbox"/>	E	O		M	

Council Officer: LC

Document: Deposit Plan, p.64

Site: 410/ Mill Street

Delete Site

Policy: H01.49

Map: Inset 27: Caerleon Inset Plan

Summary: Objects to inclusion of site at Mill Street, Caerleon

Item Question Representation Text

2 2 Policy Number
H1 Pages 62 - 65

11 11 Site Name
Mill Street

12 12 Site Reference
H1 (49)

14 14 Representation

I have noted the high attendance at the Council's LDP Public meetings in Caerleon. Residents are very concerned about any further development in Caerleon due to any associated increase in traffic, air pollution and loss of our very limited supply of open spaces. All these issues undermine the quality of life in Caerleon, particularly in the town centre.

With this in mind I would like to SUPPORT Policy H1 of the plan for not including the many candidate sites in and around the town of Caerleon as development allocations. I would also like to raise concerns about the Allocation of Mill Street (H1 (49)). I do not support the inclusion of the Mill Street site for the reasons already set out i.e. over development, loss of open space, additional traffic and associated air pollution, traffic and parking problems. I also believe there may be issues in relation to access and egress etc

My previous submissions under the Candidate Sites Consultation are set out below and I would like these comments to be taken into account as the plan is taken forward to adoption.

1. Caerleon has ancient and very limited infrastructure which includes a one way system, thus bringing nearly all traffic through High Street, Mill Street and across Caerleon Bridge
2. Unacceptable, toxic levels of pollution have already been identified in High Street. More development = more traffic = more pollution which increases the health risks to residents in particular
3. Caerleon has very little open space - no public park, very little access to the riverside (other than the new cycleway) or surrounding countryside
4. Caerleon is an internationally renowned historic site and described as the jewel in Newport's crown. Tens of thousands of tourists visit each year.
5. Caerleon already suffers from over development, excessive speeding traffic, parking problems, narrow pavements, heavy lorries and HGVs,
6. Caerleon is situated on a flood plane
7. The river Usk is a SSSI
8. Further developments contradict the aim of sustainability
9. Development of any of the proposed candidate sites has the potential to damage Caerleon's environment because of increased traffic, loss of open space & green field areas, effects on the flood plane and reduction of quality of life for the present residents.
10. A sustainability and traffic study must be undertaken, including a detailed assessment of air quality
11. Protecting and improving Caerleon's environment should be the priority.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

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<i>Item Question</i>			<i>Tick-box reply</i>							
10	10	Delete an existing site.	Yes							

1237.D1//R6 Wm Morrison Supermrkts Peacock & Smith 24/05/2012 P O M

Document: Deposit Plan, p.92

Site: 361/ Newport Retail Park

Boundary Change

Policy: R6

Summary: Objects to the designation of Newport Retail Park as a district centre.

Item Question Representation Text

14 14 Representation

Morrisons are a major food and grocery superstore retailer who operate stores in Newport and Rogerstone. They would therefore like to be kept informed and consulted on further stages of preparation of the Local Development Plan.

Section 8: Retailing and the City Centre

Our client strongly objects to the designation of Newport Retail Park as a District Centre. This shopping park provides a traditional out of centre retail park format with large amounts of car parking and stores with large footprints. We do not consider that this retail park meets the characteristics of a district centre.

Newport Retail Park include a PC World, Next, Asda Living, Outfit (incorporating Burton, Miss Selfridge, Wallis, Evans, Principles, Warehouse and Dorothy Perkins) and Sports Direct. These shops do not offer the type of goods which people require on a day to day basis. The retail park does not include the types of facility that would normally be expected to meet local shopping needs, such as a post office, bank/building society, hairdressers or florist.

We note from Council's District Centres Background Paper, that the gross retail floorspace at the Retail Park is equivalent to about 73% of the Newport City Centre and it is far larger than the other defined District Centres, and indeed has almost as much floorspace as the rest of them put together.

In addition to not offering the types of facilities and services that we would normally expect in a District Centre, we also consider that the retail park has expanded beyond what is appropriate for a District Centre. We note that paragraph 8.18 of the draft LDP states that further development of the retail park will pose a treat to the vitality and viability of the City Centre. It is in this context, that Draft Policy R6 seeks to restrict additional sales floorspace at the retail park/ whilst we support what the Council is trying to achieve by this policy, we consider that it is fundamentally unsound to restrict retail floorspace within a defined centre. We therefore consider that the retail park should be redefined s an out of centre retail park, whereby the retail policy tests of Planning Policy Wales, relating to need, impact and sequential test, can apply.

I trust that the above is helpful and I would be grateful if you could ensure that Peacock and Smith remain on the consultation database on behalf of Morrisons to be informed of the outcome of this consultation stage.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

No

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1237.D2//R7	Wm Morrison Supermrkts	Peacock & Smith		24/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.92

Policy: R7

Summary: Objects to policy that restrict retail floorspace within a defined retail centre

Item Question *Representation Text*

14 14 Representation

In addition to not offering the types of facilities and services that we would normally expect in a District Centre, we also consider that the retail park has expanded beyond what is appropriate for a District Centre. We note that paragraph 8.18 of the draft LDP states that further development of the retail park will pose a treat to the vitality and viability of the City Centre. It is in this context, that Draft Policy R6 seeks to restrict additional sales floorspace at the retail park/ whilst we support what the Council is trying to achieve by this policy, we consider that it is fundamentally unsound to restrict retail floorspace within a defined centre. We therefore consider that the retail park should be redefined s an out of centre retail park, whereby the retail policy tests of Planning Policy Wales, relating to need, impact and sequential test, can apply.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

No

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1238.D1/5.5/H01	Cantwell, Mrs K M			14/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.62, para.5.5

Site: 145/155.C1 St Cadocs

Policy: H01

Summary: Opposes development of the St Cadoc's site

Item Question Representation Text

3 3 Paragraph or section number(s)
5.5

14 14 Representation

(P64 sect 5.5) I note that whereas the St Cadoc's Hospital site is not included as part of the Newport Local Development Plan 2011-2026, it is still included as a windfall site should the land become available. The proposed development of 8 hectares to include 250 residences would be a disaster for Caerleon. The access via Lodge Road is subject to much congestion at peak times due to traffic from the University and the Comprehensive and Endowed Schools. The narrow railway bridge is barely wide enough for two cars to pass when travelling in opposite directions and Pillmawr Road is single track in parts. The cycle route which was intended to alleviate traffic problems has not done so neither would the mooted Railway Station. A development of this size would greatly increase motorised traffic to the detriment of air quality and pedestrian safety.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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1238.D2/H49/H01	Cantwell, Mrs K M			14/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.62, para.H49

Site: 410/ Mill Street

Delete Site

Policy: H01

Summary: Opposes development of the site at Mill Street, Caerleon

Item Question Representation Text

3 3 Paragraph or section number(s)
H49 (LDP ref)

14 14 Representation
Only 12 houses are to be built here, but in an area which already experiences traffic congestion at certain times this will be detrimental to both traffic flow and parking.

15 15 Do you want to speak at Public Examination?
Not Ticked
Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked
Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1238.D3	Cantwell, Mrs K M			14/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LC

Document: Deposit Plan, p.0

Site: 152/1665.C1 Park Farm, Caerleon

Summary: Opposes development at Park Farm candidate site

Item Question Representation Text

14 14 Representation

Park Farm

Park Farm was not mentioned as a site marked for development in the current plan although a map of the area was included in the documentation. I would like assurance that the development of this site will not occur for two reasons;

1: The area is a greenfield site which would be destroyed by this massive 81 hectare development.

2: The existing roads, Lodge Road, Pillmawr Road and Malthouse Lane are inadequate to take the extra traffic that such a huge development would bring. The building of extra link roads would only serve to increase traffic in Caerleon to unacceptable levels.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1238.D4//CF10	Cantwell, Mrs K M			14/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.105

Policy: CF10

Summary: Development should be closely monitored

Item Question Representation Text

2 2 Policy Number
CF10

14 14 Representation

Any expansion of the Celtic Manor resort needs to be carefully monitored, The Usk Valley is an area of outstanding natural beauty which for this reason attracts many tourists. As such it is a great asset to the area and must not be destroyed by short-sighted overdevelopment which will destroy this area for future generations. The Penrhos Farm site, covering 110 hectares, mentioned on the initial list of Candidate sites, has not appeared in this document. I would like an assurance that it will not be considered as part of the Celtic Manor expansion. The roads involved, namely Pontir Road, Mill Street and Goldcroft Common are all narrow highways passing residential areas containing historic buildings. Road widening is not an option. All of this traffic will have to cross one narrow bridge designed before the days of the motor car. Extra traffic would seriously damage historic buildings.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1238.D5/5.7/H01	Cantwell, Mrs K M			14/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.62, para.5.7

Site: 145/155.C1 St Cadocs

Policy: H01

Summary: Concern regarding impact of development at St Cadocs on traffic congestion in Caerleon.

Item Question Representation Text

14 14 Representation

The traffic flow and parking within Caerleon is still problematic. It is often necessary to walk reasonable large distances to reach one's destination. These two important factors need to be monitored thoroughly before any new developments, however small, are considered

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1374.D11//R2 Newport Unlimited

28/05/2012



W

M

Document: Deposit Plan, p.89

Policy: R2

Map: Inset 26: Newport City Centre

Summary: Supports removal of part of Commercial street as primary retail frontage

Item Question Representation Text

5 5 Inset Plan(s)

Yes

Inset Plan 26

14 14 Representation

Newport Unlimited strongly supports the Newport City Council statement that the area of Commercial Street beyond the pedestrianized zone included in the Town Centre Shopping Area (as referred to in Inset Plan 26) should have its designation removed. We believe this redesignation will have an important benefit to the area as it will allow more flexible development not limited to retail and thus help to facilitate the regeneration objectives for the city (please refer to Sheila Davies for further detail on the extent of the reduction).

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1374.D2/H32/H01	Newport Unlimited			28/05/2012	<input type="checkbox"/>	W			M	

Document:Deposit Plan, p.62, para.H32

Policy: H01

Summary: Commented on the name given to the site, should be referred as 'Former Sainsburys'

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number H1	
3	3	Paragraph or section number(s) H32	
14	14	Representation Policy H1 (page 63) refers to site H32 as "Existing Sainsburys". Following the closure of the supermarket, we believe that this title is now out-of-date and that the site should now be referred to as "Former Sainsburys".	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1374.D3(i)/R10	Newport Unlimited			28/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.96, para.(i)

Policy: R10

Summary: Wants amendment to text of Policy R10 (i)

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number R10	
3	3	Paragraph or section number(s) R10 (i)	
14	14	Representation Policy R1 (page 96) states that: PROPOSALS FOR LARGE SCALE RETAIL DEVELOPMENT ON SITES OUTSIDE THE CITY CENTRE OR DISTRICT CENTRES WILL NOT BE PERMITTED UNLESS: (i) NEED IS IDENTIFIED; Newport Unlimited would support changes to the wording of this policy from (i) NEED IS IDENTIFIED; to (i) EXCEPTIONAL NEED IS IDENTIFIED; in order to strengthen the authority's desire to discourage new out of town retail development in the city.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1374.D4/H15/H01	Newport Unlimited			28/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.62, para.H15

Policy: H01

Summary: Change name of site H15 to 'Victoria Wharf, Old Town Dock'

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number H1	
3	3	Paragraph or section number(s) H15	
14	14	Representation Policy H1 (page 62) refers to site H15 as "Edward Ware, Old Town Dock". Due to the change in ownership of the site we recommend that the site should revert to its original name, which we believe to be "Victoria Wharf, Old Town Dock".	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1395.D11//SP01	Atwell, Cllr David			28/05/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Development within Langstone ward should occur on brownfield sites within the settlement boundary.

Item	Question	Representation Text	Soundness Test
7	7	A new paragraph or new text.	Yes
11	11	Site Name All sites in Langstone Ward	
14	14	Representation I wish to make a general comment regarding all Candidate sites outside of the settlement boundaries as illustrated within your supplied drawings and text that relate specifically to the Langstone Ward. Any/All development should take place within the settlement boundaries on Brown Field sites only, reasons as follows;- There is a lack of infra-structure to the existing settlement areas such as Drainage, Highways and Sustainability, this in my view would not support any further Development outside of those boundaries. The existing UDP currently in force, supports the Councils Policy of Brown Field Sites over Green Field Sites. The Current UDP in force supports all areas outside the Settlement boundaries as Countryside or in stronger terms and this should continue. GENERALY The above comments reflect the response of residents in general terms following a recent consultation on a specific site, and further endorsed on the door, through the normal canvass process at the Local Government Election May 2012. In addition, I have also received a number of written comment and e-mails from residents also broadly in agreement with the above.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Both refs as supporting sheets ref. Section 11 Waste & Candidate Sites	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1395.D2//W1	Atwell, Cllr David			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.113

Policy: W1

Summary: Replace text Section 11 'Waste'

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number 11 Waste	
3	3	Paragraph or section number(s) 11.2	
7	7	A new paragraph or new text.	Yes
14	14	Representation DEPOSIT PLAN MARCH 2012 Please read in conjunction with Part 3, your representation and suggested changes as per form submitted. Para/sectionSECTION 11 'WASTE' Para 11.2 After waste targets line 2, delete all existing text and substitute; Newport City Council will review its future waste policy with immediate effect and select economically affordable options which avoid mass burn incineration, and will provide the greenest and safest solution of disposal.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Both refs as supporting sheets ref. Section 11 Waste & Candidate Sites	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1395.D3//W1	Atwell, Cllr David			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.113

Policy: W1

Summary: Replacement or delete text in Policy W1 - Para 11.4, 11.5, and 11.6

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number W1	
3	3	Paragraph or section number(s) 11.4, 11.5, 11.6	
7	7	A new paragraph or new text.	Yes
14	14	Representation Para/section SECTION 11 W 1 Delete; LAND IS ALLOCATED FOR A REGIONALLY SCALED WASTE MANAGEMENT FACILITY ON LAND SOUTH OF LLANWERN STEELWORKS (4Ha) Para/section 11.4 After landfill gas engines and before and a waste transfer station, insert; 'a possible mechanical and biological treatment facility'. Para/section 11.5 and 11.6 Delete all	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Both refs as supporting sheets ref. Section 11 Waste & Candidate Sites	
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1395.D4/11.8/W3	Atwell, Cllr David			28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.114, para.11.8

Policy: W3

Summary: Delete text from Policy W1 para 11.8

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number W3	
3	3	Paragraph or section number(s) 11.8	
14	14	Representation Para/section 11.8 Delete the following: 'Additional information relating to Newport's waste related land use requirements are set out in the Waste Background Paper and the related footnote'.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Both refs as supporting sheets ref. Section 11 Waste & Candidate Sites	
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1400.D1/2.35-2.39/	Duthie, Mr and Mrs A & L	Derek Prosser Associates		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.62, para.2.35-2.39

Site: 307/ Magor Road Nurseries

New Site

Policy: H01

Map: Constraints Plan - East

Summary: Wants site to be included with in the urban boundary. Site includes land outside of red line plan submitted as candidate stage.

Item Question Representation Text

2 2 Policy Number

SP10 (H1)

3 3 Paragraph or section number(s)

Paras 2.35-2.39

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Rep. 1668

The first of the Assembly Government's objectives for housing is:-

- "to provide more housing of the right type and offer more choice."

Furthermore, the Assembly Government will seek to ensure that:-

- "the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains, and, where possible enhances important landscape and wildlife features in the development."

As openly indicated in the Deposit Plan, the supply of housing is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permission for many years and seem no nearer to be developed now. There appears to be a complacent attitude that few more sites need to be allocated, even though the end date for the Plan is 2026. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

Also, national government emphasises the need to make up the shortfall in affordable housing provision.

The dependence on brownfield sites, where development costs are higher, is in danger of not producing the required affordable housing provision because of the threat to the viability of development.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites. It accepts that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Deposit Plan provides for its housing sites to be totally concentrated within the urban boundaries of the City with no opportunities beyond the urban boundaries. In particular there are no new allocations within Langstone, even though the village has shown the capacity to absorb new development and has been provided with new employment opportunities during the past decade.

The last published Joint Land Availability Study shows the City to have land available to provide a 3.5 year land supply when set against the UDP requirements. This will not have substantially improved with permissions granted since, when the next study is published shortly. It is suggested that, compared with the past 5 year build rates, the land supply equates to 6.4 years but the build rates were constrained by insufficient range of sites available for early development, depending so much on regeneration of brownfield sites. The Council's current Deposit Plan strategy is likely to suffer the same problems.

The Study showed that only 23.8% of the dwelling units were likely to be built within 5 years whereas over 73% would not become available until after the first 5 years.

National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. The Deposit Plan does little to address the short term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above-mentioned deficiencies. One such allocation would be that identified on the attached plan. Langstone is well located on the main eastern approach to the City and has had infrastructure and employment improvements over the past decade. The Coldra Roundabout has had major improvements to improve its capacity and further development east of Langstone will enhance the City's housing supply. There are good public transport links with Newport.

While the land is largely open fields and hedgerows, its important landscape and ecological features can be retained and enhanced in the development. Its allocation has the prospect of bringing forward early affordable housing provision and could accommodate local services and facilities as required.

National Government suggests a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the planning process to allow a faster lead-in time to development. The Deposit LDP proposals do little to provide a range of housing sites offering choice, variety and quality in the short term and flexibility to deal with changes in circumstances. This site in Langstone will enhance the housing allocations and the development opportunities in Newport during the Plan period.

15	15	Do you want to speak at Public Examination?								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.				No					
13 13	Test of Soundness									
	C1, C2, C3, CE1, CE2, CE4									
<i>Item Question</i>										
8 8	Add a new site.				Yes					

1400.D2//H01 Duthie, Mr and Mrs A & L Derek Prosser Associates 28/05/2012 W O M

Document: Deposit Plan, p.62

Site: 355/ Ford Farm

Boundary
Change

Policy: H01

Summary: Land at Ford Farm, Langstone should be included within the settlement boundary.

<i>Item Question</i>	<i>Representation Text</i>	
4 4	The Proposals Map	Yes
14 14	Representation	
	Urban boundary should be consistent with the adopted UDP so that it includes Ford Farm Langstone	
15 15	Do you want to speak at Public Examination?	Yes
16 16	Subject to speak on at Examination	
	I want to demonstrate to the Inspector how the Listed buildings within Ford Farm can be included in a redevelopment to safeguard their future.	
<i>Item Question Soundness Test</i>		
1 1	I think the LDP is sound.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1417.D11//SP01	CPRW (Newport & Valleys Branch)				<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Supports proposal to strengthen green belt and emphasis on the development on brownfield sites.

Item	Question	Representation Text	Soundness Test
4	4	The Proposals Map	Yes
5	5	Inset Plan(s) Llanwern village	
9	9	Amend the boundaries of an existing site.	Yes
14	14	Representation <p>This representation is made on behalf of the Campaign for the Protection of Rural Wales (CPRW), Newport and Valleys branch. CPRW has a broad aim of protecting rural landscape and countryside for the benefit of all. The Newport and Valleys branch takes a close interest in any planning proposal which would unnecessarily damage the rural character around Newport and neighbouring local authorities. We note the important point made in the Plan that 70% of the land area of Newport is rural. One of the benefits of living in Newport is the ease of access to the countryside and the quality of the local landscape. We strongly support the maintenance (and extension) of the areas designated as green belt in the previous UDP to help prevent coalescence between Cardiff and Newport. We also support the re-introduction of Special Landscape Areas which brings necessary additional protection to those areas of countryside which have a higher scenic value or level of bio-diversity. We support wholeheartedly the emphasis on the development of brownfield sites and we are glad that the projected housing requirement over the life of the plan can be met primarily from such land. We raised a concern at the preferred strategy stage of the plan that the build rate was not likely to be attained. We considered this very important because we felt that a failure to achieve the Plan build rate could lead to successful appeals on out of plan planning applications on green field sites. We note that in the deposit version of the plan that the build rate has been reduced. We are therefore happier that the revised numbers could be achievable depending on the state of the economy over the period of the plan. We do feel that a very tight reign should be taken with green field site development-primarily, of course, so that there is minimum development into the countryside but also to ensure the continuing commercial viability of brownfield site development in Newport (as you state in your overview it is important not to undermine the brownfield strategy). There are, however, two Greenfield sites that concern us in respect of development. One is the Plan site around Llanwern village earmarked for 1,100 houses. Whilst planning permission has been granted on this site, as far as we are aware no work has yet commenced. We would welcome any effort to reduce the impact in any way of this development. It is currently a large open area of countryside and visible from surrounding areas. Its development will undermine the critically important Glan Llyn brownfield site. The other greenfield site is not in the Plan but is under pressure for development and representations will be made by the developer to include the site in the final version of the LDP. This is the Gorelands site at Langstone, which if fully developed would include approximately 1000 houses. This large site is on rising open countryside to the north of the A48. Development here would significantly reduce the rural aspect along the A48 and broadly extend the ribbon development that has damaged the area in the past. Its consent would considerably undermine the brownfield site strategy.</p>	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1418.D1//SP01	Pontymister Dev Ltd	Boyer Planning	- Cardiff	29/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.14

Site: 402/ Land at Risca Road

Boundary
Change

Policy: SP01

Summary: Delete allocation of site on Land at Risca Road, Rogerstone as Green Wedge in deposit LDP.

Item Question Representation Text

2 2 Policy Number

SP7 - Green Wedge (ii) Rogerstone and Risca

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

Land at Risca Road, Rogerstone

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

GREEN WEDGE

Page: 19

Policy Reference: SP7 – Green Wedges

1.0Introduction

1.1Pontymister Development Ltd objects to the inclusion of land at Risca Road from within Green Wedge (ii) Rogerstone and Risca.

1.2Inclusion of this land within the Green Wedge results in the Deposit Local Development Plan being unsound in terms of the following tests of soundness:

- C2 in that the Green Wedge boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs;
- CE4 in that the Green Wedge does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0Amplification

Planning Policy Wales

2.1Paragraph 4.7.12 of Planning Policy Wales (2011 4th Ed) describes how, in defining Green Wedges it is “important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account.

2.2Furthermore, at paragraph 4.7.13 Planning Policy Wales states that “As with Green Belts, when considering green wedges local planning authorities will need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed green wedge”.

Housing Numbers

2.3As detailed with the representation to Policy H1 – Housing Sites it is evident that there is a shortfall of approximately 5000 dwellings with the Plan period. Therefore, appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location, such as Risca Road, Rogerstone.

Site Characteristics

2.4As PPW outlines that land should only be included within a Green Wedge where it is strictly necessary and given that there is evidence for additional housing sites for removal from the Green Wedge and should be allocated for residential development.

2.5With regard to the site characteristics a detailed description is provided within the supporting Development Framework Document, however in relation to the removal of the site from the Green Wedge the following characteristics are highlighted:

- The site adjoins the existing settlement boundary of Rogerstone and is bound to the south and east by existing residential development;
- Given that the site is located some 240m back from the existing development limit of the settlement of Rogerstone, as defined by the line of properties fronting onto Risca Road and Woodland Drive, a sufficient Green Wedge buffer would remain and continue the separation of Rogerstone and Risca;
- As the site adjoins the settlement boundary any new housing would be nestled into the lower lying visually well enclosed land immediately behind the existing residential dwellings;
- In considering the adjoining Monmouthshire and Brecon Canal it is evident that the site is positioned at a much lower level, and the principle of residential development adjoining the canal has been established by the recent residential development at Pontymason Rise and Great Oaks Park;
- The site allows a controlled expansion of the urban area; providing a logical rounding off of the settlement which can be achieved by adopting a sensitive design for the site.

2.6Overall it is considered that the site characteristics allow removal of the site for development without being to the detriment to the remaining Green Wedge.

2.7Furthermore, taking in to consideration the above and separate representations made to the omission of the site for housing under Policy H1, the requirement to increase the housing provision set out in Policy H1 and in relation to the settlement boundary as per Policy SP5, it is clear that the site is suitable for residential development and in order to address the higher housing requirement there is a need to allow modest extensions to the settlement boundary and removed the site from the Green Wedge.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3.0 Required Change										
3.1 That the Green Wedge (ii) Rogerstone and Risca be amended by omitting the land at Risca Road, Rogerstone										
Additional Information Submitted - Available on Request										
15	15	Do you want to speak at Public Examination?							Yes	
16	16	Subject to speak on at Examination								
Due to the significant issues raised in the representations										
<i>Item Question</i> <i>Soundness Test</i>										
1	1	I think the LDP is sound.							No	
13	13	Test of Soundness								
Inclusion of this land within the Green Wedge results in the Deposit Local Development Plan being unsound in terms of the following tests of soundness:										
<ul style="list-style-type: none"> •C2 in that the Green Wedge boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales; •CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; •CE4 in that the Green Wedge does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances. 										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1418.D2//SP05	Pontymister Dev Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.18

Site: 403/ Land at Risca Road

Boundary
Change

Policy: SP05

Map: Constraints Plan - West

Summary: Remove SP05 countryside allocation of site on land at Risca Road, Rogerstone in Deposit LDP

Item Question Representation Text

2 2 Policy Number
SP5 - Countryside

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name
Land at Risca Road, Rogerstone

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

COUNTRYSIDE & SETTLEMENT BOUNDARY

Page: 18

Policy Reference: SP5 – Countryside

1.0 Introduction

1.1 Pontymister Development Ltd objects to the inclusion of land at Risca Road within the Countryside and the omission from within the settlement Boundary of Rogerstone. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:

- C2 in that the settlement boundary is not sufficient robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 – Housing Sites it is noted that whilst Newport are utilising the Welsh Government projections the implications of the Newport City Council Local Housing Market Assessment have not been fully taken into consideration.

2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within Policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

2.3 In considering the above the separate Housing submission recommends that a housing requirement be set that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. This has been estimated at a requirement of around 12,494 dwellings. In addition, to this it is recommended that an additional 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates should be added. Consequently this generates an estimate requirement provision figure for the plan period of 16,100 dwellings well above the 10,900 as proposed within the Deposit Plan.

2.4 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Rogerstone to incorporate the site at Risca Road would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.5 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.6 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2011 4th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.7 Given that a number of the existing allocated sites are on previously development land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.8 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.9 The characteristics and location of the site at Risca Road accords with the relevant criteria in order to provide a sustainable settlement extension:

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- The site immediately adjoins the settlement boundary of Rogerstone and is subject to urban influences;
- The extension of the settlement to provide residential development would be wholly compatible with the neighbouring established land uses;
- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car; and
- The site located where the capacity of existing and potential infrastructure, are available.

2.10The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0Development Framework Document

3.1In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at Risca Road as a housing allocation site and the consequent inclusion within the settlement boundary of Rogerstone has been prepared.

3.2The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carries out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.

4.0Required Change

4.1That the site at Risca Road be removed from the Countryside and the settlement boundary for Rogerstone be amended to include land to the as shown on the attached plan.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
Due to significant issues raised in the representations.										

Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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13	13	Test of Soundness								
Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:										
•C2 in that the settlement boundary is not sufficient robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;										
•CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and										
•CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.										

<i>Item Question</i>	<i>Tick-box reply</i>
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8	8	Add a new site.								Yes
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Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1418.D3//H01	Pontymister Dev Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.62

Policy: H01

Map: Constraints Plan - West

Summary: Objects to housing allocations in the deposit LDP, questioning the deliverability of those sites.

Item Question Representation Text

- 2 2 Policy Number
H1 - Housing Allocations (Numbers)
- 11 11 Site Name
Land at Risca Road, Rogerstone

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Policy Reference: Policy H1 Housing

1.1 On behalf of Pontymister Development Ltd we object to the approach taken by the Deposit LDP with regards to the housing requirement.

1.2 We consider the approach taken by the Council against the requirements of Planning Policy Wales (PPW), which sets out criteria that Local Authorities must take account of when setting their housing requirement. Whilst the Authority has used the WG projections as their starting point, they plainly ignore the implications of the Local Housing Market Assessment that they have submitted as part of their evidence base which when based on up to date information and extrapolated forward indicates a much higher level of need than provided for.

1.3 We also consider that it is inappropriate to rely upon a number of the sites identified within policy H1 that are subject to numerous constraints and have remained undeliverable for some time. A number of such sites are identified as "new allocations" whereas in reality they have been carried through previous plans with no developer interest or signs of such interest.

1.4 In this context and based on our consideration of the Plan in relation to National Policy requirements, it is our view that the housing requirement is wholly inadequate and contrary to the following tests of soundness:
C1 in that it does not have proper regard to other plans, policies and strategies relating to the area;

- C2 in that the housing provision strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- C3 in that it does not have regard to the Wales Spatial Plan;
- C4 as it does not have regard to the relevant community strategy;
- CE1 in so far as the proposed housing provision strategy does not flow logically from the proposed strategy of the plan;
- CE2 in that this level of housing is not realistic and appropriate having considered the alternatives and is not founded on a robust and credible evidence base in terms of local need;
- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local needs and promote future economic growth.

1.5 Accordingly, in order to make the plan sound it is necessary for the Council to increase the housing requirement and to identify a robust and deliverable supply of land for housing. We set out our reasoning in the following paragraphs.

2.0 Factors Underpinning the Housing Requirement

2.1 Para 9.2.1 of Planning Policy Wales (4th edition) indicates that in planning the provision for new housing local authorities must take account of the following:

People , Places, Futures - The Wales Spatial Plan;
Statutory Code of Practice on Racial Equality in Housing - Wales;
the Assembly Government's latest household projections;
local housing strategies;
community strategies;
local housing requirements (needs and demands);
the needs of the local and national economy;
social considerations (including unmet need);
the capacity of an area in terms of social, environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing;
the environmental implications, including sustainable building standards (see Section 4.11), energy consumption, greenhouse gas emissions and flood risk;
the capacity of the existing or planned infrastructure; and
the need to tackle the causes and consequences of climate change.

2.2 Whilst 9.2.2 indicates that the starting point for assessing housing requirements is the latest Government Household projections but it is very clear that other sources of local evidence should be considered.

"In estimating housing requirements local planning authorities should integrate the provisions of their local housing strategies with the relevant provisions of their development plans".

Representation Details

Newport City Council Local Development Plan

by: Representation No

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2.3 PW expressly requires that Local Planning Authorities should consider the appropriateness of the projections for their area based on all sources of evidence including the need for affordable housing identified by their Local Housing Market Assessment (LHMA). I deal with this in more detail below, however, it is evident that the LHMA relied upon by Newport is both out of date (published in 2007) and plainly inaccurate in terms of its predictions of how matters would have proceeded over the 5 years following its publication to the present day.

2.4 Based on the Planning Policy Wales requirements, it is evident that having regards to the criteria listed, the Deposit LDP has significant shortcomings in relation not only to national guidance but also other plans, the community strategy, the evidence base, housing need and the Plan's own objective. We consider below the key elements in setting a housing requirement.

3.0 Strategies and Plans

The Deposit LDP Vision and Objectives

3.1 The Deposit LDP Objectives clearly set the context for what the policies within the Plan must achieve. Objective 4 seeks to ensure that there is an adequate supply of land for housing which meets the needs of the populations. It explains that the LDP proposes a level of housing that enables everyone to have access to decent housing.

3.2 The primary role of the subsequent policies within the LDP is clearly to help achieve the strategic objectives. It is evident that in this case these are not "cascaded down" into the policies within the Plan that are intended to implement the strategy. Indeed, the approach to housing provision adopted within the Deposit LDP is based on a LHMA (absent an up to date Assessment) that plainly identifies a level of need that is higher than the level of growth proposed and comprises a significant number of sites that have proven undeliverable through the UDP process - such that there remains a residual requirement from the LDP. In that regard the plan clearly cannot achieve its own vision or objectives.

The Wales Spatial Plan (WSP)

3.3 The aspirations for the South East Region are set out in detail in the WSP, in particular the vision for the area is to create "an innovative skilled area offering a high quality of life - international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and Europe, helping to spread prosperity within the area and benefiting other parts of Wales."

3.4 To adopt a restrictive approach towards housing is fundamentally out of line with the overarching vision for the region and will not contribute towards the achievement of the main priorities identified in the WSP including Promoting a Sustainable Economy.

Local Housing needs

3.5 The LHMA submitted as evidence in support of the plan does not form a reliable source of evidence. It was published in 2007, five years before the LDP was placed on deposit and included assumptions over the deliverability of housing land between 2006 and 2011 that have proven to be an underestimation of actual delivery.

3.6 Page 27 of the LHMA sets out that the number of net additional dwellings required between 2003 and 2021 is 12,100. With 1,210 completed in 2003 to 2006, 3,630 planned between 2006 and 2011 and then a residual requirement of 7260 (726 per annum) over the 10 years between 2011 and 2021. I would note that the LDP plans for 151 dwellings less than this per annum and 1510 dwellings less over all during this period.

3.7 Furthermore, it is possible to update the calculations on behalf of the Council.

The Residual target as of 2006 was 10,890 from 2006 to 2021. Minus actual completions between 2006 and 2011 (2,561 rather than 3,630 dwellings anticipated in 2007) equates in a residual requirement between 2011 and 2021 of 8,329 dwellings (832.9 dwellings per annum). Again the LDP provision would be 258 less per annum and 2,579 dwellings less than required over the period to 2021.

3.8 If the LHMA requirement to 2021 was extrapolated forward for the plan period to 2026 then it would equate to 12,494 dwellings required over the plan period. This is significantly more than proposed by the Deposit LDP.

3.9 In the absence of any more up to date Housing Market Assessment this clearly forms a significant consideration, insofar as it is plainly the case that the Council's housing supply would not meet the requirements set out in their Local Housing Market Assessment, rather there would be a significant shortfall.

3.10 The WG "Homes for Wales" white paper indicates that if they are to be effective, LDP's require a robust evidence base and as part of this "Local authorities must assess the need for all types of housing, using up-to-date Local Housing Market Assessments." Whilst this is a consultation paper it is clear that LHMA's contribute towards the evidence base in informing policies and current policies fall short of what is desirable.

Representation Details

Newport City Council Local Development Plan

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Newport Community Strategy

3.11 The Newport Community Strategy sets out the key aspirations for the local community 2010 to 2020. The aim of the strategy is to enhance the quality of life of local communities through actions to improve their economic, social and environmental wellbeing. The Vision is to create a "proud and prosperous city with opportunities for all". This includes objectives related to create a thriving economy, for people to thrive and live in a safe and inclusive economy.

3.12 The approach taken by the Deposit LDP towards housing provision implies that the Community Strategy cannot be achieved. Indeed, the lack of basic provision of housing to meet identified needs can only be considered to be contrary to the fundamental requirements of people and can only harm the implementation of the Community Strategy. As such the LDP can only be considered to be unsound in its current form as it effectively undermines the Community Strategy for the area.

4.1 Social Considerations & Housing Requirements

4.1 The Assembly Government's vision for housing in Wales, Better Homes for

People, is that everyone should have the opportunity to live in good quality, affordable housing; be able to choose where they live; and decide whether buying or renting is best for them and their families.

4.2 In addition to the LHMA, the Local Housing Strategy update (2010) indicates that there are 5,100 households on the waiting list for affordable housing. This level of need equates to significantly more housing (regardless of tenure) than that identified by the LDP.

4.3 The Plan's strategy should be capable of dealing efficiently with a range of circumstances. By not proposing a housing requirement in line with evidence of housing need, the LDP will not be able to deal with the implications of population change, household growth and demand and will not be able to meet the housing needs of its population contrary to Welsh Assembly aspirations and the Deposit LDP Strategy.

4.4 Were the Plan not to provide an adequate level of overall housing provision this would have significant harmful social and economic effects.

4.5 It is a WG objective to tackle social exclusion and to reverse social inequalities. Access to decent housing is at the heart of social inclusion. Under provision of housing through the planning system will undermine this. The greatest impact will fall upon low income households and young people looking to become active in the housing market. Under-provision leads to overcrowding, concealed households and poor quality housing and is contrary to the objectives of the Welsh Government to secure social inclusion.

5.0 Local Economic requirements

5.1 Housing provision forms part of the supporting framework in order to support the Welsh Government's aim to increase employment and local growth. Indeed, the WG Economic Renewal Strategy 2010 sets out the Welsh Government's objectives for helping to shape the future of the Welsh Economy and leading the Country out of recession. The programme sets out a new direction for economic renewal and is based on the understanding that the economy is "simply to dynamic to forecast credibly over the long term". As such the Strategy sets out how the WG (and other levels of Government) can help to "shape the conditions in which a dynamic economy functions, and the role the government and wider public sector can play in encouraging success in the private and third sectors".

5.2 A constrained housing market will have an inflationary impact on land and house prices - which will only exacerbate existing problems. Housing shortages and high prices will limit the ability of labour markets to develop. This will inevitably result in shortages of skilled labour, increasing wage levels and increased long distance commuting. Such problems damage competitiveness, restrict the ability of companies to expand and deter employers from locating in the area and damage employment growth. Jobs will ultimately be lost to other regions in Wales, the UK and to Europe.

5.3 It is imperative that the Plan adopts a robust and positive approach to economic growth (and housing provision) so as to avoid the harmful effects that will occur under the present approach and importantly to avoid a continuation of existing trends that sees young local families unable to compete on the housing market due to the influx of retirees from other parts of the United Kingdom.

6.0 Housing Land Supply

6.1 Allied to our objection to the overall level of housing is our objection to the Council's housing land supply estimate which underpins the allocation of new housing land in Policy H1. Indeed, PPW is explicit that sites should be identified that are land is genuinely available or will become available for development - and importantly sites must be free or readily freed from planning, physical and ownership constraints and economically feasible for development so as to create communities where people want to live.

6.2 There are a significant number of sites that the Council envisage will be brought forward in the LDP that were identified within the UDP and remained undeveloped and classified in the latest JHLAS as 3(i). Where constraints exist it is unlikely that such sites will be brought forward in the LDP period as has historically been the case - this is demonstrated in consecutive Joint Housing Land

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Availability Studies. This emphasises the importance of ensuring a robust supply of land. I highlight several of those sites below:

1. Unimplemented UDP Sites - subject to constraints (flood risk, remediation etc), (including Glebelands, Herbert Road, Whiteheads and Crindau);
2. High density flat schemes - a number of high density flatted schemes have been mothballed in recent years or have under delivered. As such there is little justification for the inclusion of a number of schemes where there is no apparent market interest (including Penmaen Whard, Newport Athletic Club);
3. Overestimation of delivery - I note at Llanwern that based on the trajectory within the agreed Statement of Common Ground for the 2011 JHLAS, it is estimated that it would deliver 2100 dwellings during the plan period, leaving 1900 dwellings outside of the plan period not c.1000 as envisaged by the Council. In addition, it is indicated that Allt Yr Yn will comprise 200 dwellings, however, planning permission on the site was 129 units;
4. S106 sites - there is no evidence presented to suggest that these sites will actually be brought forward.

6.3 It is our view that based on trends over the UDP period, it is highly unlikely that a number of the identified sites will deliver at the levels that Newport envisage. Should the above categorisations be born out then there would be a shortfall of between 3,000 and 4,000 dwellings on the level envisaged as being appropriate by Council i.e the WG projection plus the flexibility allowance.

Phasing

6.4 At para 2.38 we note that Newport CC indicate that many of their brownfield sites had progressed slowly due to the economic recession between 2009 and 2011. Whereas in actual fact, many of the Brownfield sites remained undeveloped with no interest or unimplemented planning permissions through the peak of the market in the early to mid 2000's and are still categorised in 3(i) of the JHLAS. Indeed, as a sign of the constrained nature of the housing supply in Newport, the peak rate of completions was 714 in 2001 and fell as low as 340 completions in 2004 and 425 in 2005 - as generally in the UK the housing market was moving towards its peak.

6.5 The reliance upon phasing within the UDP was proven to be wholly unreliable and cannot be a basis for carrying forward through the LDP. Indeed, the strategy was rather haphazard - when the UDP required 400 dwellings per annum between 2001 and 2006 they were in fact averaging 508 completions, however, for the final five years the average was significantly below the 740 dwellings required. This resulted in an overarching shortfall of 400 dwellings of the overarching requirement not being provided - this amounts to nearly a years supply of housing not being provided. Clearly this is not acceptable in light of the significant level of housing need identified within the LHMA.

6.6 It is evident that there is no basis for a strategy of phasing in Newport, particularly not when the council should be encouraging high rates of development to meet the unmet requirements of the UDP and the high levels of housing need identified by the LHMA which were also unmet.

Flexibility Allowance

6.7 There should be an element of flexibility in the housing land supply. This is accepted within the Council's existing figures 25% component of any housing land supply estimate to reflect the fact that not all sites with planning permission or allocated in the Plan will be developed either in whole or in part within the Plan period. Planning permissions may lapse and sites may be developed for alternative purposes - as has proven to be the case through the UDP. Such an allowance for non implementation is significantly more important when considering the needs within the area and the number of UDP sites that have remained undeveloped due to constraints.

7.0 Conclusion

7.1 In our submission, and having regard to the requirements of a plan-led system and Planning Policy Wales, the Plan should seek to meet the future accommodation needs of its inhabitants which is essential if the City is to thrive as envisaged by the Community Strategy.

7.2 The implications of such a restrictive approach include lack of private sector investment, exacerbation of housing shortages and failure to achieve the key objectives of the LDP. Rather there should be a strong element of forward thinking in order to produce a sound Plan to ensure that long term issues are addressed and that needs are met in the most sustainable manner. In this context, and having regard to the matters set out herein, adopting a higher growth scenario as a basis for land allocations is essential to produce a sustainable and sound strategy which meets the needs of the County.

8.0 Required Change

8.1 That a housing requirement be set for the County that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. We estimate, based on the available indicators, around 12,494 dwellings. In addition to this figure should be added a 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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8.2 In light of the identified problems within County in terms of affordability providing to meet estimated housing requirements is essential to ensure an adequate supply of land, retain local families and young people. Constraining supply in these terms would inevitably result in a very unbalanced community profile contrary to the aims and objectives of the LDP.

8.3 Our estimated requirement provision figure for the plan period is 16,100 dwellings. We would hope that the Council will be willing to engage in meaningful discussions with parties such as ourselves to resolve any technical differences over the assumptions used prior to the Examination.

8.4 Accordingly, additional sites must be allocated in order to meet this shortfall. To that extent the land at Risca Road, Rogerstone is considered acceptable to accommodate some of the required shortfall.

8.5 The supporting Development Framework Document which has been prepared in relation to Risca Road summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 35 dwellings.

8.6 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP7 - Green Wedge, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

8.7 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at Risca Road within the settlement of Rogerstone is deliverable. In this regard the allocation at Risca Road will assist in providing certainty over delivery and housing supply within the plan period together with alternative range and choice.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
Due to significant issues raised in representations.			

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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In this context and based on our consideration of the Plan in relation to National Policy requirements, it is our view that the housing requirement is wholly inadequate and contrary to the following tests of soundness:
C1 in that it does not have proper regard to other plans, policies and strategies relating to the area;

- C2 in that the housing provision strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- C3 in that it does not have regard to the Wales Spatial Plan;
- C4 as it does not have regard to the relevant community strategy;
- CE1 in so far as the proposed housing provision strategy does not flow logically from the proposed strategy of the plan;
- CE2 in that this level of housing is not realistic and appropriate having considered the alternatives and is not founded on a robust and credible evidence base in terms of local need;
- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local needs and promote future economic growth.

<i>Item Question</i>	<i>Tick-box reply</i>
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6	6	A new policy	Yes
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
8 8	Add a new site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1418.D4//H01	Pontymister Dev Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P			M	

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 336/ Land at Risca Road

New Site

Policy: H01

Map: Constraints Plan - West

Summary: Wants site at Risca Road allocated as housing site in Deposit LDP

Item Question Representation Text

- 2 2 Policy Number
- H1 - Housing Sites (Allocations)
- 11 11 Site Name
- Land at Risca Road, Rogerstone

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation
HOUSING ALLOCATION

Page: 62

Policy Reference: Policy H1 Housing

Introduction

1.1 Pontymister Developments Ltd objects to the omission of the land Risca Road, Rogerstone as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:

- C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The broadly rectangular shaped 2.72ha site is situated immediately adjoining the settlement boundary for Rogerstone. The site comprises of a number of fields which are currently laid for grazing and pasture and rise in levels from south to north. To the south the site adjoins the existing residential development at Risca Road, comprising a combination of bungalows and two storey housing. To the east is Pontymason Lane, beyond which is further residential development, including additional housing forming Pontymason Rise and Pontymason Close. The Monmouthshire and Brecon Canal and Conservation Area as well as the Oaktree Cottage form the northern boundary and are separated from the site by a strong vegetation buffer, whilst beyond the western boundary are a number of fields, woodland and residential properties at Woodland Drive which separate the site from the Newport Administrative boundary and Risca beyond.

2.2 The site is within a sustainable location close to a good range of facilities including a post office, shops, restaurants, places of worship and employment areas that are all within reasonable walking and cycling distance. Rogerstone Primary School (1.2km) and Bassaleg Secondary School (2.8km) are also conveniently located.

2.3 In regard to public transport regular bus services run along Risca Road providing both links between Newport and Risca/Pontymister Tesco as well as between Newport and Blackwood. Furthermore Rogerstone railway station is within 800m of the site and forms part of the Ebbw Valley line providing an hourly service Monday to Saturday between Cardiff Central and Ebbw Vale Parkway.

3.0 Housing Requirement

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

Housing Requirement

3.2 As detailed within separate submissions made in relation to Policy H1 – Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated site as well as the requirement to meet local needs as set out within the Local Housing Market Assessment a more appropriate requirement provision figure for the plan period would be 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at Risca Road would actively assist in providing a deliverable housing site to address the identified shortfall.

Settlement Boundary

3.4 As detailed within separate representations made on Policy SP5 – Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Rogerstone. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

Green Wedge

3.5 Within separate representations made in relation to Policy SP7 – Green Wedge it is recommended that the site be removed from the (ii) Rogerstone and Risca Green Wedge as due to the site characteristics and location it is not necessary to serve the function and would not be the detriment to the remaining Green Wedge.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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4.0Development Framework Document

4.1In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at Risca Road.

4.2The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 35 dwellings. It is therefore evident that the development of the site will seek to meet the housing need through the Development Plan period within the sustainable settlement location.

5.0Required Change

5.1That the land at Risca Road, Rogerstone is allocated for housing development within Policy H1 as a new site for 35 dwellings in order to meet the needs of the local community.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination Due to significant issues raised in the representations.	
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:	
----	----	--	--

- C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

<i>Item Question</i>	<i>Tick-box reply</i>
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8	8	Add a new site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1418.D5//H01	Pontymister Dev Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.62

Site: 404/ Land at Risca Road

Boundary
Change

Policy: H01

Map: Constraints Plan - West

Summary: Change to settlement boundary to include site.

Item Question Representation Text

2 2 Policy Number
H1 - Housing Sites (Allocations)

11 11 Site Name
Land at Risca Road, Rogerstone

14 14 Representation
Settlement Boundary
3.4As detailed within separate representations made on Policy SP5 – Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Rogerstone. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Due to the significant issues raised in the representations.

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:
•C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
•CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
•CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

Item Question

Tick-box reply

8 8 Add a new site. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1420.D11//SP08	Corus UK Ltd / Tata Steel UK Ltd	GVA Grimley		11/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.20

Policy: SP08

Map: Proposals Plan - East

Summary: Objects to designation of Tata owned land under Policy SP8

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP8 - Special Landscape Area	
4	4	The Proposals Map Eastern Proposal Map	
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Llanwern Steelworks	
12	12	Site Reference 25	
14	14	Representation Please see attached statement ref: GVA/07A816677/DLDP	
15	15	Do you want to speak at Public Examination?	Yes
		<i>Item Question</i>	<i>Soundness Test</i>
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1, CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1420.D2//CE13	Corus UK Ltd / Tata Steel UK Ltd	GVA Grimley		11/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.58

Policy: CE13

Map: Proposals Plan - East

Summary: Object to designation of Tata owned land at Llanwern under Policy CE13

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number CE13 - Undeveloped Coastal Zone	
4	4	The Proposals Map Eastern Proposal Map	
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Llanwern Steelworks	
12	12	Site Reference 25	
14	14	Representation Please see attached statement ref: GVA/07A816677/DLDP	
15	15	Do you want to speak at Public Examination?	Yes
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1, CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1420.D3//EM01	Corus UK Ltd / Tata Steel UK Ltd	GVA Grimley		11/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.73

Policy: EM01

Map: Proposals Plan - East

Summary: Extend the allocation of the tata land currently allocated under allocation EM1 to EM2 (iii).

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number EM1 (ii)	
4	4	The Proposals Map Eastern Proposal Map	
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Llanwern Steelworks	
12	12	Site Reference 25	
14	14	Representation Please see attached statement ref: GVA/07A816677/DLDP	
15	15	Do you want to speak at Public Examination?	Yes
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1, CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1420.D4//EM02	Corus UK Ltd / Tata Steel UK Ltd	GVA Grimley		11/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.77

Policy: EM02

Map: Proposals Plan - East

Summary: Welcome inclusion of site allocation under Policy EM2 (iii), however do not consider that this policy is broad enough to fully take account of the development opportunity presented by the Tata site.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number EM2 (iii)	
4	4	The Proposals Map Eastern Proposals Map	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Llanwern Steelworks	
12	12	Site Reference 25	
14	14	Representation Please see attached statement ref: GVA/07A816677/DLDP	
15	15	Do you want to speak at Public Examination?	Yes
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
1	1	I think the LDP is sound.	Yes
13	13	Test of Soundness CE1, CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1420.D5//SP05	Corus UK Ltd / Tata Steel UK Ltd	GVA Grimley		11/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.18

Policy: SP05

Map: Proposals Plan - East

Summary: Land under Tata ownership should be included within the urban boundary and not allocated as countryside under Policy SP5.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP5 - Countryside	
4	4	The Proposals Map Eastern Proposals Map	
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Llanwern Steelworks	
12	12	Site Reference 25	
14	14	Representation Please see attached statement ref: GVA/07A816677/DLDP	
15	15	Do you want to speak at Public Examination?	Yes
		<i>Item Question</i>	<i>Soundness Test</i>
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1, CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1421.D1//GP04	Giles, Brenda			28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.39

Policy: GP04

Map: Inset 27: Caerleon Inset Plan

Summary: Any additional development in Caerleon would require improvements in the traffic system.

Item Question Representation Text

14 14 Representation
Rep. 1421

I attended the meeting re: the above at Caerleon town hall on 22nd May, and, as invited, I am writing of areas of concern.

Caerleon is fed mainly via a hump-backed bridge, where no two large vehicles can pass, i.e. a lorry crosses the central white line. Sadly we have a large amount of industrial vehicles from their estates in Ponthir, also large heavy vehicles situated in Llangybi, who all use this highway, so there is always waiting at each end in order to pass. Apart from all the industrial vehicles we have a regular time table of buses, and of course all domestic traffic as the majority of the 10,000 or so residents in Caerleon, plus students, have to use this bridge. We then all travel up narrow High Street, which in parts measures 10 foot wide.

Slow traffic causes heavy pollution, black soot is visible on all buildings, especially the lower end. This pollution has been monitored since 2005 and has increased, so have the industrial and domestic vehicles owing to planning and licences being granted.

No monitoring of traffic has been done in lower High Street. Monitoring has taken place on Caerleon Road, Ponthir Road, Mill Street and Castle Street ect., and an attempt was made on the bridge a few years ago, but the rubber strip ended up randomly dangling across the bridge, and, after two attempts it disappeared. Unfortunately, we never get to know the volume of traffic in lower High Street which incorporates traffic from Caerleon Road, New Road and Castle Street. What I do know and have previously written about, is the birds-eye view I have from my living room of the congestion of traffic in High Street. Twice a day during school term times, and other times for example a funeral at the church, deliveries to shops, buses at bus stops, inconsiderate parking, drunkenness, or any other incident on the one way system, traffic can be at a standstill in less than a minute at certain times of the day. As previously stated, during these times, all emergency services ride along the pavement after vehicles large and small juggle and zigzag to make way, having to mount the opposite pavement; and as before mentioned, it has become accepted practice.

Along High Street there are many listed buildings, rules and regulations apply to their owners including no double glazing. The road in which these houses sit, some dating back to 1700, was deemed a conservation area many years ago. I think that means 'worthy of enhancement' I'm sure the conservation department would put it more clearly. In truth of course they sit dusted in black industrial soot, and are subject to the vibration one would expect from heavy industrial vehicles on such a narrow road.

If more building is to take place in Caerleon, then a better, healthier, and more safer road system, which is desperately overdue, needs to be in place, otherwise it would be irresponsible to do so. As a gentleman at the meeting said 'it's the same bridge as the 30's'.

I do hope correct home-work is done, and that you listen to those of us who live here.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness									
	P1, C1. The proposed LDP boundaries of Redwick village by Newport City Council, needs to be discussed at public hearing.									
	<i>Item Question</i>								<i>Tick-box reply</i>	
8 8	Add a new site.								Yes	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1425.D2//H01	Cromwell, Mr Paul			29/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.62

Site: 309/ Land at South Row

New Site

Policy: H01

Map: Inset 7: Redwick Village Boundary

Summary: Wants site included in Redwick village boundary

Item Question Representation Text

4 4 The Proposals Map

End of boundary at South Row, Redwick

5 5 Inset Plan(s)

Plans enclosed

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

South Row Redwick

12 12 Site Reference

1633

14 14 Representation

1)Change, bungalow to detached house

2)Change, area from 1.67 acres to 3.34 acres sites references 1425 and 1633 total.

3)See attached map of land ref 8241

4)If the council do not include the above land into LDP, then I wish to apply to put this land into agricultural use, and apply to build one detached house and agricultural buildings on the above land.

5)Proposed development boundary, South Road Redwick house known as Green Court, to the Poplars via Deep Lake Cottage, should be scrapped and revert back to as it is now (Community Council should explain)

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

Newport City Council and Redwick Community Council have had meeting regarding the LDP without any regards to land owners wishing to put their land into LDP, between them both, they have tightened the boundary from the UDP to LDP, the boundary should extend to the cottage known as Jasmond at the end of South Row Redwick.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

P1, C1. The proposed LDP of the boundaries of Redwick village by Newport City Council, needs to be discussed at Public Hearing.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.									Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1429.D1//T1	Network Rail			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.82

Policy: T1

Summary: Supports Policy T1 of the LDP. Requested that impact of development of level crossings be considered by planning policy. The LDP should set a strategic context requiring developer contributions towards rail infrastructure.

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Dear Sir/Madam

Network Rail has been consulted by Newport City Council, on the Local Development Plan 2011 - 2026. Thank you for providing us with this opportunity to comment on this Planning Policy document.

Upon the review of this document, Network Rail has the following comments to make:-

Section T1 Railways

The provision of new stations at Llanwerwm Caerleon, Coedkernew and Pye Corner, Bassaleg.

We would refer you to the Route Utilisation Strategy Document (RUS), Wales, (link below), Network Rail will continue to liaise and hold discussions with Newport City Council and SEWTA in looking at future new stations as identified in the RUS, Wales, and located within its area. The promotion of early implementation of train services on the Ebbw Valley Line into Newport. Any proposals to develop and enhance services on the Ebbw Valley Line, are currently being reviewed by the Welsh Government. The promotion of early implementation of electrification of the London – South Wales Mainline Network Rail is fully engaged in developing electrification along the South Wales mainline to Cardiff. Supporting applications for Government grant for new rail facilities Network Rail is willing to discuss any new rail aspirations with any promoters/stakeholders etc. Notwithstanding the above comments specifically linked to this planning document Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below.

Level Crossings Development proposals affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision. As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that:

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:

Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".

Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and

The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.

Developer Contributions

The Local Development Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.

Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:

A requirement for development contributions to deliver improvements to the rail network where appropriate.

A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.

A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Planning Applications

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those hereby enclosed).

Rail AspirationS

With this in mind, I enclose a link to Network Rail's website;

<http://www.networkrail.co.uk/browseDirectory.aspx?dir=\\RUS%20Documents\\Route%20Utilisation%20Strategies\\Wales&pageid=2895&root=>

This link provides access to Network Rail's Wales Route Utilisation Strategy (November 2008) of which sets out the strategic vision for the future of the railway in this vital part of the railway network. It is hoped that this will be of use to the Council to keep you up to date with future aspirations for railway development in Newport.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1429.D2//H01

Network Rail

13/06/2012

E

O

M

Document:Deposit Plan, p.62

Site: 311/ East Usk Yard

New Site

Policy: H01

Map: Proposals Plan - East

Summary: Wants new candidate site at East Usk Yard to be considered for inclusion in the LDP

Item Question Representation Text

14 14 Representation

I believe there remains an opportunity to promote alternative or new candidate sites as part of this consultation. The purpose of this additional representation is to put forward a new site for consideration as a candidate site for allocation in the new Development Plan. This site is the 'East Usk Yard' in Newport, currently used for operational railway purposes. We seek allocation for residential development. Please find enclosed a completed Candidate Site Form and Site Location Plans for your reference. We believe that this is all the information your Council require to consider this site.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1453.D1//CE07	Outdoor Media Centre	Chris Thomas Ltd		19/04/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.51

Policy: CE07

Summary: Objection to policy CE7 Signs and Advertisement as it is overrestrictive

Item Question Representation Text

14 14 Representation

These representations are submitted on behalf of the Outdoor Media Centre (OMC, formerly the Outdoor Advertising Association) in respect of Policy CE7 and supporting text in the Deposit Draft of the LDP.

The OMC represents 97% of the outdoor advertising industry and monitors development plans to ensure the emerging plan policies do not inappropriately apply more onerous considerations on advertisements than already apply within TAN7, 'Planning Policy Wales', Welsh Office Circular 14/02 and the Town and Country Planning (Control of Advertisements) Regulations 1992 and the Amendment Regulations 1994.

Policy CE7

The policy correctly identifies that all advertisements should be carefully designed and sited so as to relate to the building and surroundings. Paragraph 4.17 of the supporting text to the policy states that permanent advertising hoardings will not be acceptable, especially in or near conservation areas and listed buildings. The OMC object to this statement in paragraph 4.17 as unsound. As advised in paragraph A1 of Annex A to TAN7:

"Any application to a local planning authority ..., which involves the display of a poster, is to be considered on its own merits with regard to the general characteristics of the locality in which it is to be displayed."

The Annex then contains advice on the suitability of poster advertising in various locations, including conservation areas and near buildings of historic merit. This clearly follows the Town and Country Planning (Control of Advertisements) Regulations 1992 which require that the display of outdoor advertisements can only be controlled in the interests of amenity and public safety.

As such, any advertisement would be acceptable if it was not determined to amenity or public safety. The Council should not impose additional blanket restrictions on "permanent advertising hoardings", since this would breach both the Regulations and the policy on TAN7. The first sentence of paragraph 4.17 should therefore be deleted from the LDP as being contrary to both the legislation and national planning policy guidance.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1456.D1//SP12	The Theatres Trust			22/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.24

Policy: SP12

Summary: Supports Policy SP12

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP12	
14	14	Representation We support the document in respect of Policy SP12 Community Facilities and Requirements as para.2.45 states that existing facilities will be retained and enhanced which what we would expect to see in a Local Development Plan. The opening paragraph lists types of community facilities and states that any development affecting existing facilities should retain or enhance the facility. We suggest for clarity that Policy CF13 Protection of Existing Community Facilities should include a succinct version of the description for the term community facilities and there is none in the Glossary, and suggest community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. We also suggest that there are many areas of overlap in the document making it lengthy and difficult to follow. For instance Policy CF13 could easily be incorporated as a paragraph within SP12 as it does not provide further guidance for community facilities as a separate policy.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1456.D2//CF13	The Theatres Trust			22/05/2012	<input type="checkbox"/>	W			M	

Document:Deposit Plan, p.108

Policy: CF13

Summary: Policy CF13 should be incorporated into Policy SP12

Item Question Representation Text

14 14 Representation

We support the document in respect of Policy SP12 Community Facilities and Requirements as para.2.45 states that existing facilities will be retained and enhanced which what we would expect to see in a Local Development Plan. The opening paragraph lists types of community facilities and states that any development affecting existing facilities should retain or enhance the facility. We suggest for clarity that Policy CF13 Protection of Existing Community Facilities should include a succinct version of the description for the term community facilities and there is none in the Glossary, and suggest community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. We also suggest that there are many areas of overlap in the document making it lengthy and difficult to follow. For instance Policy CF13 could easily be incorporated as a paragraph within SP12 as it does not provide further guidance for community facilities as a separate policy.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D1//H15.02	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Council Officer: DLD

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Proposals Plan - East

Summary: Objects to inclusion of site (ii) in Policy 15.

Item Question Representation Text

2 2 Policy Number
H15

4 4 The Proposals Map
Proposals Map East

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Newport Deposit Local Development Plan Representations on behalf of St Modwen Development Limited

Savills is instructed by St Modwen Development Limited (SMDL) to make an objection in respect of the Newport Deposit Local Development Plan (DLDP).

The objections relate specifically to policies H15 and H16 on gypsy and traveller transit and residential accommodation. Reference is also made to Policy H17 (Gypsy and Traveller Accommodation Proposals).

This letter explains the reasons behind our objections and should be read in conjunction with the representations form, which is enclosed. It starts with a review of policy before looking at the content of the plan and the changes we recommend need to be made.

National planning policy guidance

Planning Policy Wales (PPW) (Edition 4, February 2011) allows for the release of sites for affordable housing, including Gypsy and Traveller accommodation as an exception to normal policies. Two key tests are set. The first is that a genuine need must be demonstrated and the second is that in identifying sites for such uses, sites must be suitable for housing in all other respects. This approach is reinforced in the Welsh Government's circular 30/2007 'Planning for Gypsy and Traveller Caravan Sites' (December 2008), which states that if a site is not suitable for a "conventional" form of residential use, it is not suitable for a Gypsy and Traveller site.

Guidance also states that such sites:

- should be easy to reach and close to essential services such as shops, schools and doctors;
- should be in or near to an existing town or village;
- should not be in places at risk of flooding; and
- should not be located near to any potential hazard, such as a dual carriageway, industrial site, river or canal.

Gypsy Traveller Site Design Guidance (2009)

Guidance makes a number of recommendations on site design and facilities, one of which is the size of the site. It states that the ideal size is generally not more than 12 pitches, in line with Gypsies and Travellers' preferences for smaller sites. It states that bigger sites of up to 20 pitches 'should only be developed where there is a clear and demonstrable reason to act against such a presumption'.

DLDP policies

Queensway Meadows is allocated under Policy H15 (Gypsy and Traveller Transit Accommodation) and the 'Former Army Barracks, Pye Corner' and the 'Former Army camp Site, Pye Corner' are allocated under Policy H16 (Gypsy and Traveller Residential Accommodation) of the DLDP. This means that three sites are proposed in very close proximity and, in some ways, could be seen as a single cluster, rather than as three separate allocations.

Objections

Objection forms are included in relation to the following policies, text and proposals map.

LDP Proposals Map East, Policies H15 and H16

In light of guidance contained within PPW and the Welsh Government's circular, we question the suitability of the three sites for Gypsy and Traveller use and, therefore, set out below the basis of our objection to the allocations. We consider each site in turn.

Queensway Meadows

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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The site is located on the Leeway and Queensway Meadows Industrial Estate and is, therefore, surrounded by existing employment uses. The site is also allocated as part of Policy EM1(ii) (Employment Land Allocations), which proposes large scale employment projects of at least 10 hectares. This area has no hours of use or use or process restrictions and it is, therefore, unsuitable for conventional housing and, therefore, unsuitable for Gypsy and Traveller accommodation. On the one hand, noise or other emissions could create a very poor residential environment, whilst on the other the introduction of a new residential community could trigger objections to existing users. Causing this type of situation (and this type of tension) is expressly discouraged by planning policy. The site is also in an area at risk of flooding and is isolated from nearby residential facilities and, any essential services. It is clearly unsuitable for any form of residential use and fails the key locational test of national planning policy guidance.

As outlined in PPW and the Welsh Government's circular, if a site is not suitable for a form of residential use, it is not suitable for a Gypsy and Traveller site. Our analysis of the Queensway Meadows demonstrates that the site could not be considered suitable for housing use and, as such, cannot be suitable for Gypsy and Traveller use.

For the reasons set out above, we conclude that the site contradicts national guidance set out by the Welsh Government and for this reason we question its suitability for Gypsy and Traveller use and respectfully request that further consideration is given to other more suitable alternative sites to meet the identified need. A wider area should be considered for this search.

Change required: delete site (ii) of Policy H15.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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The proposed allocation of the site referred to above for Gypsy and Traveller use is unsuitable. It raises significant issues and SMDL is a key stakeholder. We also have significant experience of development issues in the area and the clear need to be involved in discussions about its future.

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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Please see covering letter, dated 28 May 2012. The plan fails on the following tests: C1, C2, CE1, CE2, and CE4.

<i>Item</i>	<i>Question</i>	<i>Tick-box reply</i>
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6	6	A new policy	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D2//H16.02	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Council Officer: DLD

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Proposals Plan - East

Summary: Objects to inclusion of sites (ii) and (iii) allocated under Policy H16

Item Question Representation Text

2 2 Policy Number

Policy H16

4 4 The Proposals Map

Proposals Map East

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Newport Deposit Local Development Plan Representations on behalf of St Modwen Development Limited

Savills is instructed by St Modwen Development Limited (SMDL) to make an objection in respect of the Newport Deposit Local Development Plan (DLDP).

The objections relate specifically to policies H15 and H16 on gypsy and traveller transit and residential accommodation. Reference is also made to Policy H17 (Gypsy and Traveller Accommodation Proposals).

This letter explains the reasons behind our objections and should be read in conjunction with the representations form, which is enclosed. It starts with a review of policy before looking at the content of the plan and the changes we recommend need to be made.

National planning policy guidance

Planning Policy Wales (PPW) (Edition 4, February 2011) allows for the release of sites for affordable housing, including Gypsy and Traveller accommodation as an exception to normal policies. Two key tests are set. The first is that a genuine need must be demonstrated and the second is that in identifying sites for such uses, sites must be suitable for housing in all other respects. This approach is reinforced in the Welsh Government's circular 30/2007 'Planning for Gypsy and Traveller Caravan Sites' (December 2008), which states that if a site is not suitable for a "conventional" form of residential use, it is not suitable for a Gypsy and Traveller site.

Guidance also states that such sites:

- should be easy to reach and close to essential services such as shops, schools and doctors;
- should be in or near to an existing town or village;
- should not be in places at risk of flooding; and
- should not be located near to any potential hazard, such as a dual carriageway, industrial site, river or canal.

Gypsy Traveller Site Design Guidance (2009)

Guidance makes a number of recommendations on site design and facilities, one of which is the size of the site. It states that the ideal size is generally not more than 12 pitches, in line with Gypsies and Travellers' preferences for smaller sites. It states that bigger sites of up to 20 pitches 'should only be developed where there is a clear and demonstrable reason to act against such a presumption'.

DLDP policies

Queensway Meadows is allocated under Policy H15 (Gypsy and Traveller Transit Accommodation) and the 'Former Army Barracks, Pye Corner' and the 'Former Army camp Site, Pye Corner' are allocated under Policy H16 (Gypsy and Traveller Residential Accommodation) of the DLDP. This means that three sites are proposed in very close proximity and, in some ways, could be seen as a single cluster, rather than as three separate allocations.

Objections

Objection forms are included in relation to the following policies, text and proposals map.

LDP Proposals Map East, Policies H15 and H16

In light of guidance contained within PPW and the Welsh Government's circular, we question the suitability of the three sites for Gypsy and Traveller use and, therefore, set out below the basis of our objection to the allocations. We consider each site in turn.

Former Army Barracks, Pye Corner

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Similar criticisms can be made to this proposed allocation. The site falls within a protected flood plain and is also allocated as part of Policy EM1(ii) (Employment Land Allocations), which proposes large scale employment projects of at least 10 hectares. The policy also makes it clear that this area is very sensitive to any activity and will be reserved for projects which are themselves very sensitive or which will require freedom from constraint if they are to be attracted to the area.

As for Queensway Meadows, as simple cross reference to the Welsh Government's circular, shows that the site is clearly unsuitable for Gypsy and Traveller use. It is proposed to be located in an area surrounded by industrial uses with noise implications. The site is also set away from any existing towns or villages and, therefore, any essential services. The locational test for conventional housing is, therefore, failed.

Former Army Camp, Pye Corner

Again, the above concerns about suitability arise for this proposed allocation. Here, important additional issues are raised by the position of the site within a designated Special Landscape Area (SLA) and outside settlement boundaries. It also falls within a protected flood plain. Immediately to the north is land allocated for employment use under Policy EM1(ii) of the DLDP, which is identified as being suitable for large scale projects of at least 10 hectares.

The site also lies within the proposed 'Undeveloped Coastal Zone'. Policy CE13 (Coastal Zone) specifies that development will only be permitted if it must be on the coast to meet an exceptional need which cannot reasonably be located elsewhere. The area must not be at risk of flooding, nor should the proposed development exacerbate risks from erosion, flooding or land instability. Paragraph 4.50 of the supporting text to Policy CE13 recognises that undeveloped areas of the coast include sites of international and national importance, as such, "these areas will rarely be appropriate for major development". Proposals for development in this location will need to demonstrate that such a location is essential together with information to demonstrate that the development can be carried out without significant adverse effects.

Considered against the criterion included within the Welsh Government's circular, this site cannot be considered suitable for 'Gypsy and Traveller Residential Accommodation' for a number of reasons. It will be located near to a potential hazard, an employment site allocated for large scale projects, with potential noise implications. The site is located outside the settlement boundary, set away from any existing towns or villages and, therefore, any essential services. It is within a protected flood plain, a designated SLA and within the 'Undeveloped Coastal Zone', all designations confirm that the allocation of the site is inappropriate for any form of housing and, therefore, for gypsy and traveller residential accommodation.

General Location and Clustering to the South East of the City

Whilst, all of the sites are unsuitable (and should be deleted), they also appear to be in the wrong place generally. There are two reasons for this. The first comes from the current location of all authorised private, unauthorised development and unauthorised encampment Gypsy and Traveller sites. These are all located in west Newport. All the sites proposed by NCC as part of the DLDP are located in east Newport and the three sites we are concerned about all lie very close together in a small part of South East Newport.

The proposals map for the DLDP illustrates the close proximity of the three sites identified above. These will act as a single large cluster or, effectively, as one site. National guidance contained within the Welsh Government's circular states that Gypsy and Traveller sites should "...respect the scale of and not be so large as to dominate the nearest settled community serving them. They should also avoid placing an undue burden on the local infrastructure". Proposing three sites in such close proximity would undoubtedly dominate the surrounding communities to the south.

Furthermore, with reference to guidance contained in relation to size of site within 'Gypsy Traveller Site Design Guidance', the sites referred to above are of sufficient size to accommodate more than 12 pitches, which is the preferred size. No justification has been provided for proposing bigger sites, and this is unlikely to exist given the range of other sites that might be available to the north and north east of Newport, or to the west (where some current sites already are).

Conclusions

As outlined in PPW and the Welsh Government's circular, if a site is not suitable for a form of residential use, it is not suitable for a Gypsy and Traveller site. Our analysis of the three sites demonstrates that each site could not be considered suitable for housing use and, as such, cannot be suitable for Gypsy and Traveller use.

For the reasons set out above, we conclude that the three sites contradict national guidance set out by the Welsh Government and for this reason we question the suitability of the three sites for Gypsy and Traveller use and respectfully request that further consideration is given to other more suitable alternative sites to meet the identified need. A wider area should be considered for this search.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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Change required: delete sites (ii) and (iii) of Policy H16

Item Question	Soundness Test
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1 1	I think the LDP is sound.	No
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13 13	Test of Soundness
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Please see covering letter, dated 28 May 2012. The plan fails on the following tests: C1, C2, CE1, CE2, CE4.

Item Question	Tick-box reply
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6 6	A new policy	Yes
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1466.D3//H17	St Modwen Developments Ltd	Savills	28/05/2012	<input type="checkbox"/>	E	M
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Document: Deposit Plan, p.72

Policy: H17

Summary: Require clarity with regards Policy H17.

Item Question	Representation Text
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2 2	Policy Number Policy H17
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14 14	Representation
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Policy H17 (Gypsy and Traveller Accommodation Proposals)

The title of Policy H17 implies that it is a general policy relating to Gypsy and Traveller accommodation proposals. However, the wording of the policy refers to proposals for Gypsy and Traveller Caravan sites. It is, therefore, necessary to clarify the intention of this policy. If it is to relate to all Gypsy and Traveller accommodation proposals, the policy reinforces our argument that the three sites identified above are not suitable for such use.

Change required: clarify the intention of Policy H17

15 15	Do you want to speak at Public Examination?	No
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Item Question	Soundness Test
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1 1	I think the LDP is sound.	No
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13 13	Test of Soundness
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Please see covering letter, dated 28 May 2012. The plan fails on the following tests: CE1, CE2, CE4.

Item Question	Tick-box reply
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6 6	A new policy	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D4//W1	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Council Officer: DLD

Document: Deposit Plan, p.113

Site: 424/ South of Llanwern Steelworks

Delete Site

Policy: W1

Map: Proposals Plan - East

Summary: Allocation of a regionally scaled waste management facility on land south of Llanwern Steelworks is removed from Policy W1

Item Question Representation Text

2 2 Policy Number

Policy W1

3 3 Paragraph or section number(s)

Paragraphs 11.4-11.6

4 4 The Proposals Map

Proposals Map East

5 5 Inset Plan(s)

n/a

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Newport Deposit Local Development Plan Representations on behalf of St Modwen Development Limited – Policy W1 (Proposed Waste Management Facility on land south of Llanwern Steelworks) Savills is instructed by St Modwen Developments Limited (SMDL) to make an objection in respect of the Newport Deposit Local Development Plan (DLDP). This letter should be read in conjunction with the representations form, which is enclosed.

Introduction

This objection relates specifically to Policy W1 of the DLDP concerning the proposed allocation of 4ha land for a 'regionally scaled waste management facility' on land south of Llanwern Steelworks. As explained below, the key source of SMDL's concern relates to the impact of the proposed facility on the area and infrastructure that surrounds it. We also question the need for the allocation given the very specific project it is designed to accommodate, and the availability of an alternative site that has been thoroughly tested. The structure and content of our objection is set out as follows: first, we have considered the strategic context in which the proposed allocation is sought to be made – in respect to national planning policy and LDP Policy SP21 (and the waste planning principles which support it). We go on to discuss the current planning application submitted by Veolia for an Energy Recovery Facility (ERF) on the proposed allocation site and repeat the concerns we have already raised with the Council about the potential impact of the proposals on the adjacent area and infrastructure. Whilst this letter relates to the proposed allocation site, given the presence of the existing proposals, the proposed allocation and current application should be considered together. Finally, in light of our comments and concerns, the letter highlights where the proposed allocation is considered to fail three of the Tests of Soundness and the changes that are required to correct this position.

Planning Policy Wales Edition 4 (2011)

Planning Policy Wales (PPW) confirms that development plans should demonstrate how the objectives in the national waste strategy (and obligations required by European legislation) have been taken into account. Paragraph 12.6.2 states that development plans should identify sites for waste facilities or areas where such facilities may be suitable. In assessing the suitability of sites for waste management facilities (albeit with reference to development control), paragraph 12.7.1 goes on to state that the environmental impact of proposals for waste management facilities must be adequately assessed, supported by independent surveys where appropriate, to determine whether a [planning application] is acceptable and, if the adverse impacts on amenity cannot be mitigated, [planning permission] should be refused. Given the nature of waste management land uses and the potential environmental impacts such uses will often generate, careful scrutiny ought to be afforded to the potential adverse environmental effects when establishing the principle of use of land through new allocations.

Strategic Context of Deposit Policy W1

We are aware of, and appreciate, the strategic policy context set out in deposit Policy SP21 concerning waste management. The general thrust of this policy is supported. SP21 seeks the sustainable management of waste arisings in Newport to be facilitated by the Council's promotion and support for additional treatment facilities, measures and strategies that represent the best practicable environmental option, having regard to the waste hierarchy and the proximity principle. The policy makes reference to the 'proximity principle' – reflecting the Welsh Government's support for this requirement that waste should be disposed of, or otherwise managed close to the point at which it is generated and the principle of 'regional self-sufficiency' whereby each region should aim to provide, as far as possible, sufficient capacity for managing the waste which arises within it. The sustainable waste management principles set out in the deposit LDP, as required by the Welsh Government (as well as strict EU waste related targets), are supported. 'Prosiect Gwyrdd' has clearly driven much of the regional self sufficiency agenda. Two schemes have now been shortlisted as part of this process: Viridor is proposing a merchant Energy from Waste (EfW) facility with Combined Heat and Power Facility at, Trident Park, Cardiff and Veolia is proposing an Energy Recovery Facility (ERF) at the W1 site. The procurement process for the chosen location and technology is ongoing, with a preferred bidder estimated to be selected summer 2012. The Viridor scheme in Cardiff benefits from planning permission and is clearly a deliverable and suitable alternative. It also lies much close to the sources of waste that the facility will generate. In this context, and irrespective of the current planning application proposals, in preparing their LDP the Council must balance issues of need and suitability with against the impacts that waste management facilities can trigger – especially when they serve a region rather than a settlement or an authority. Therefore, very careful consideration ought to be given by the Council to the need for new waste facilities (given proposals elsewhere in the region i.e. the existing commitment by Viridor in Cardiff), the location of proposed new waste management facilities (if necessary) and their proximity to existing and committed land uses and environmental sensitivities. There is no evidence that the Council has taken into account the need to consider alternative locations, technologies, nor cross boundary issues and proposals, in the proposed allocation of the site for a waste management facility. Past uses or proposals provide no reliable guide in this respect. The allocation is very specific and is much different to the allocation made in the current Unitary Development Plan (UDP) for waste disposal uses under Policy WD2. In the Preferred Strategy in January 2010 (paragraph 2.108), the Council recognised that this (steelworks) waste site allocation was no longer needed and proposed its removal. Since then, specific proposals have come forward on land south of Llanwern Steelworks (the planning application submitted by Veolia as described below), it would appear that the Council have 'backtracked' on the decision to remove the UDP allocation. It is inappropriate that the Council appear now, in the DLDP, to be led by current Veolia proposals and application. Current Planning Application for an ERF Savills, on behalf of SMDL, has lodged an objection to the current application for an Energy Recovery Facility (ERF) at the proposed allocation site (Application reference 11/1303). This application is submitted by Veolia, and is one of two shortlisted 'Prosiect Gwyrdd' developments, as referred to above. Given that there is a scheme which can meet the waste management needs of the region already permitted in Cardiff, it is clear that there is no need for a 'regionally scaled' facility in Newport. The committed scheme in Cardiff can, and will, dispose of municipal waste on a regional level which includes waste from Newport but which is much more central to the majority of waste it will handle. Notwithstanding the lack of need for the proposals, a number of significant concerns have been recorded and submitted in writing to the planning authority. These are attached at the end of these representations and include a technical note prepared by Halcrow on the assessment of the traffic that the scheme will generate and the effects this will have along Queen's Way. Halcrow's conclusion is that the current assessment does not reflect the amount of HGV traffic that the scheme will generate and therefore significantly underestimates the impact of the scheme on the surrounding area and the road network.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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Page 3 These are significant points and warrant inclusion within our representations on the DLDP. The scale of the facility means that it will have numerous potential effects on its neighbours and the infrastructure that serves

it. The most important of these relate to:

- Traffic and transport impacts generated by both construction and operational traffic. As indicated by the current application, the waste management facilities generate a significant increase in HGV movements as materials are delivered and taken away from the site. There are also often noise impacts resulting on an increased in construction and operation traffic (e.g. HGVs). As Halcrow's technical note states, the application will result in an increase in waste HGV movements of nearly 30% along the Queen's Way. This is not made clear in the documents that support the application.
- Amenity impacts on nearby sensitive receptors including those within the future Glan Llyn redevelopment scheme.
- Air quality impacts from the construction, operation and decommission of the waste facility can have adverse impacts (in addition to those arising from the air quality impacts associated with traffic along the Queens Way).

Whilst it is appreciated that in some instances waste management facilities can be compatible with adjacent more sensitive land uses, it is considered that that the potential impacts of the proposal on the surrounding area are too high and are currently misunderstood. The link between the application and the allocation is clearly important and it is quite possible, if not likely, that the current application will be refused by the Council. On this basis, and given that the Prosiect Gwyrdd contract is due to be awarded this summer, the site will not be selected for the waste facility that the allocation proposes. The site could fail for other reasons of course, but in either case the Council will be left with an allocation which is not needed, which has no utility and which could blight the area over the plan period. More concerning, is that if left, it might provide an incorrect signal that a different scheme may be considered acceptable even though the scheme may result in more adverse and significant impacts than the current application recognises. This reinforces the need for careful scrutiny of the allocation and the development behind it to ensure that when the latter fails, the former falls away. If it does not then we could be left with greater uncertainty and potentially greater impact.

Tests of Soundness

In light of the above commentary, the proposed allocation fails to meet three of the tests of soundness: CE1, CE2 and CE4. Justifications for the failure of each of these tests are considered in turn below. Test CE1 – With regard to waste planning and the provision of 'regionally scaled' waste management facilities, cross-boundary issues are not addressed. As noted above, permission has been granted for a similar proposal which will accept from five South Wales Local Authorities (including Newport). The proposed allocation which flows from the overall waste strategy fails to take into account the fact that there is permission for a similar 'regionally scaled' facility in Cardiff. This location is much more likely to meet the tests of the proximity principle that the LDP's strategy for waste refers to – and therefore it is considered that the proposed allocation fails to meet Test of Soundness CE1. Test CE2 – There is no evidence that the LPA have considered the relevant options and alternatives for the location of the proposed waste management facility. As highlighted above, the Preferred Strategy considered that the waste site allocation is no longer needed so the site designation will therefore be removed. Rather, as detailed in the Cover Letter, the proposed allocation in the DLDP appears to be 'led' by the current planning application for a waste facility on the site. It is inappropriate that the Council rely on the evidence submitted by Veolia as part of their (undetermined) planning application. The Council do not appear to have undertaken their own analysis (and therefore collated their own robust and credible evidence base) of the proposed development, its impacts and alternatives. Therefore it considered that the proposed allocation fails to meet Test of Soundness CE2.

Page 4

Test CE4 – Paragraph 12.22 outlines the monitoring process for objective 10 of the LDP, concerning waste.

However, this table makes no reference to policy W1. There is a need to allow for flexibility in the DLDP to enable the removal of the Policy W1 allocation should the application and Prosiect Gwyrdd procurement process fail. If the Council does not agree with the reasons for removing the proposed allocation prior to submission to the Inspector and potential adoption, the LDP should identify contingency options for the failure of the current application and a decision that the Prosiect Gwyrdd scheme goes to Cardiff. This may be addressed through Annual Monitoring Reports (AMRs). There is no provision in the DLDP for flexibility and responding to changing circumstances relating to Policy W1 and therefore it is considered that the proposed allocation fails to meet Test of Soundness CE4. Summary and Proposed Change

Based on the information set out above, we have some clear and important concerns about the way in which the proposed allocation (and associated planning application) has been assessed and the impact it could trigger. Given planning permission has already been granted for a regionally scaled waste management facility in Cardiff, there is no need or requirement for Newport Council to deliver the same form of development within its administrative boundary. As it is considered that the current Veolia proposals are likely to fail, and given the potential impacts on the surrounding area in any event, it is proposed that the allocation for a 'regionally scaled waste management facility' on land south of Llanwern Steelworks is removed from Deposit Policy W1.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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The proposed W1 allocation raises significant issues and SMDL is a key stakeholder. We also have significant experience of development issues in the area and the clear need to be involved in discussions about its future.

Item Question Soundness Test

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness CE1, CE2, CE4 - See cover letter for further details and justification.									
	<i>Item Question</i>		<i>Tick-box reply</i>							
10 10	Delete an existing site.		Yes							

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D5//SP01	St Modwen Developments Ltd	Savills		25/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Recommends alteration to the wording of Policy SP01

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP1	
7	7	A new paragraph or new text.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Representations on the Deposit Newport Local Development Plan (DLDP) on behalf of St. Modwen Developments Limited (SMDL)

Savills is instructed by St. Modwen Developments Limited (SMDL) to make representations to the Newport Deposit Local Development Plan (DLDP) in respect of the Glan Llyn scheme which sits on the former heavy end of the Llanwern Steelworks site. This is one of the Newport's (and South Wales') key regeneration projects and sits on a major road and rail gateway into both the City and the Principality.

As a headline, and given the content of the plan and the stage that the scheme has reached, we find much to support in the DLDP. However, we are concerned about the total amount of development that the plan seeks to allocate for the City over the plan period (and the comments that this might draw) and the inclusion of a number of new greenfield allocations. We also recommend that the plan's clear preference for the use of previously developed land could be tightened (principally by changes to its objectives and strategy) and suggest a small number of corrections to the plan.

In this light, we have comments to make on the following policies or parts of the plan

Policy SP1 and SP11 – Sustainability and Eastern Expansion Area
Policy SP10 – House Building Requirements
Policy H1 – Site 47
Policy H1 – Sites 56 and 57
Policy EM2 – Regeneration Site
Policy GP1 – General Development Principles
Policy GP3 – Service Infrastructure

This letter records our comments on each of the above policies of the DLDP. The comments are preceded by a brief review of the proposals at Glan Llyn and the planning position that has been reached.

Because of the way in which the LDP process works our comments are expressed as objections to the plan (even though much of what we say is supportive). Equally, the forms also require us to declare whether we find the plan sound or unsound. For reasons mainly associated with the SP10 and H1 we do consider that the plan fails the soundness test. However, the changes required are easily made and reinforce the basic ("brownfield") strategy that the plan is promoting. As we have said already, there is significant alignment between the ambitions of SMDL for the site and the aims and content of the DLDP - particularly on the need to give priority to previously developed land, and on this basis, much of what we say about the content of the DLDP is positive and supportive. However, there are some areas of the plan that we consider can and should be improved.

Glan Llyn – Current Position Background

SMDL is committed to the ongoing redevelopment of the former Llanwern Steelworks through the Glan Llyn development and the adjacent employment site. Reference is made to each of the sites under policies H1 and EM1 and EM2. Subject to the small changes recorded in this letter, these policies capture the potential of the site to create a new mixed use but housing led urban extension.

Outline planning permission was granted in April 2010 for the whole scheme which will deliver 4000 new homes and about a million square feet of a new business space. A new neighbourhood will transform this previously developed site and will include substantial new areas of open space and parkland, a new rail halt, two new primary schools and a local centre.

Development of the main new residential neighbourhoods will progress in three main sub areas, western, central and eastern and a masterplan for the western area was approved in November 2010. This contains the first 1,250 new homes, the western park and first primary school and the first part of the local centre. An application (for the approval of reserved matters) has been made and approved for 307 homes and the first homes and infrastructure that will serve them are now in place. In addition, a scheme to upgrade the Queen's Way (which is proposed under Policy SP16 (ii) in the DLDP) to provide a major new link road has been accelerated and is now also underway.

This has all been achieved in very difficult market conditions and at the beginning of the development process for a very large scheme. Very few other sites have made anything like the progress that Glan Llyn has in these conditions. Planning permission for a substantial greenfield site just to the north has been secured but no start on site has been made (or reserved matters application submitted). Elsewhere progress has been slow, and this underscores the significance of the position reached and the clear commercial potential of the site to capture interest and deliver development in the hardest of times.

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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It is therefore entirely reasonable for the Council to allocate a large part of the site for continued redevelopment over the plan period – and to expect rates of development to increase as economic conditions improve and as key milestones are made with the scheme. These will include the opening up of the Queen’s Wait, the completion and opening of the new Llanwern High School, the development of the first new primary school on the site, the opening of the Western Park and the introduction of the new rail halt.

Regeneration of the site will also see one of Wales’ largest previously developed sites recycled and a major transformation take place at a key gateway for the City and for South East Wales (especially when the Queen’s Way is opened to through traffic). This qualitative dimension of the scheme is just as important as the quantity of new housing and employment space that will be developed there. It is, however, largely missing from the DLDP at the moment and we consider that the DLDP would be improved with a clearer statement on the priority to be given to the Glan Llyn scheme over the plan period as a major regeneration scheme.

Overview, Objectives and Spatial Strategy and Strategic Policies SP1 and SP11

The most straightforward and appropriate place for such a statement (on development sequence and the importance of Glan Llyn) would be at the beginning of the DLDP.

This would not trigger a major change to the plan as there are already clear references to the sequential priority to be given to the effective use of previously developed site (and to the plan’s “brownfield” strategy. These include paragraphs 0.3 and 1.24. The threat to this strategy or sequence that can be posed by greenfield sites is also recognised by the DLDP (for example at paragraph 0.13). This theme continues into the plans Policy chapters with paragraph 2.8 being particularly clear. Here it says:

“The planning system is primarily concerned with the use of land so one of the key actions that can be taken to achieve sustainable development is to focus on reusing previously developed land as opposed to developing on greenfield sites”
However, the DLDP’s policies (and stated objectives) are much quieter on this point and whilst supporting Glan Llyn do not emphasise the overall dividend the scheme will pay to Newport and south east Wales, or its genuine significance.

To reflect this we recommend three changes are made to the plan:

The introduction of a commitment to prioritising, supporting and accelerating the use of previously developed land before greenfields to Objective 1 (Sustainable Use of Land). We see merit in including a specific reference to Glan Llyn in this objective (or in a separate objective)

The removal of the words “where possible” from point ii of Policy SP1

To change the text of Policy SP11 (or to add to it) to make it clear that the regeneration of the former steelworks will be given corporate priority and commitment from or by the Council. References to the significant benefits of the scheme should also be made to the supporting text.

Summary and Conclusions

SMDL’s representations are broadly supportive of the plan’s basic approach to Glan Llyn. This reflects the planning position reached and the clear potential of the scheme to deliver a mixed use urban extension on a previously developed site. The scheme is a major regeneration initiative and is a true commitment: planning permission has been granted, the site is in the hands of an active and experienced development company, significant and substantial infrastructure has been installed and development is underway.

Policy SP1 (ii) also makes it clear that the DLDP’s priority is to secure the regeneration of previously developed sites before greenfield land is released for development. This is sensible and sustainable and reflects a strong and established national policy direction.

There are, however, some concerns about some of the plan’s language, the clarity of its starting point and some of its individual policies. As such objections have been made to ensure that the significance of the City’s key projects is recognised and the development of previously developed sites, such as Glan Llyn, remains a priority throughout the plan period. This sees changes proposed to some of the plan’s most strategic policies as well as some of its detailed allocations. The changes are straightforward and see greater emphasis of the qualitative benefits from redevelopment projects, as well as a more open presentation of housing requirements and responses and the removal of what are clearly unnecessary, additional greenfield housing allocations. These changes will improve the plan and help to make it sound.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Objections are also raised relating to Policy EM2, which we believe, in part, is an unnecessary duplication of housing policy, given the identification of the Glan Llyn site (residential) under Policy H1.

I trust this is clear and I look forward to receiving confirmation of the registration of our representations in due course.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C2, CE1, CE2, CE4	
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<i>Item</i>	<i>Question</i>	<i>Tick-box reply</i>
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6	6	A new policy	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D6//SP11	St Modwen Developments Ltd	Savills		25/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.23

Policy: SP11

Summary: Recommends alteration to wording of Policy SP11

Item Question *Representation Text*

2 2 Policy Number

SP11

7 7 A new paragraph or new text.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Glan Llyn – Current Position Background

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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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It is therefore entirely reasonable for the Council to allocate a large part of the site for continued redevelopment over the plan period – and to expect rates of development to increase as economic conditions improve and as key milestones are made with the scheme. These will include the opening up of the Queen's Wait, the completion and opening of the new Llanwern High School, the development of the first new primary school on the site, the opening of the Western Park and the introduction of the new rail halt.

Regeneration of the site will also see one of Wales' largest previously developed sites recycled and a major transformation take place at a key gateway for the City and for South East Wales (especially when the Queen's Way is opened to through traffic). This qualitative dimension of the scheme is just as important as the quantity of new housing and employment space that will be developed there. It is, however, largely missing from the DLDP at the moment and we consider that the DLDP would be improved with a clearer statement on the priority to be given to the Glan Llyn scheme over the plan period as a major regeneration scheme.

Overview, Objectives and Spatial Strategy and Strategic Policies SP1 and SP11

The most straightforward and appropriate place for such a statement (on development sequence and the importance of Glan Llyn) would be at the beginning of the DLDP.

This would not trigger a major change to the plan as there are already clear references to the sequential priority to be given to the effective use of previously developed site (and to the plan's "brownfield" strategy. These include paragraphs 0.3 and 1.24. The threat to this strategy or sequence that can be posed by greenfield sites is also recognised by the DLDP (for example at paragraph 0.13). This theme continues into the plans Policy chapters with paragraph 2.8 being particularly clear. Here it says:

"The planning system is primarily concerned with the use of land so one of the key actions that can be taken to achieve sustainable development is to focus on reusing previously developed land as opposed to developing on greenfield sites"
However, the DLDP's policies (and stated objectives) are much quieter on this point and whilst supporting Glan Llyn do not emphasise the overall dividend the scheme will pay to Newport and south east Wales, or its genuine significance.

To reflect this we recommend three changes are made to the plan:

The introduction of a commitment to prioritising, supporting and accelerating the use of previously developed land before greenfields to Objective 1 (Sustainable Use of Land). We see merit in including a specific reference to Glan Llyn in this objective (or in a separate objective)

The removal of the words "where possible" from point ii of Policy SP1

To change the text of Policy SP11 (or to add to it) to make it clear that the regeneration of the former steelworks will be given corporate priority and commitment from or by the Council. References to the significant benefits of the scheme should also be made to the supporting text.

Summary and Conclusions

SMDL's representations are broadly supportive of the plan's basic approach to Glan Llyn. This reflects the planning position reached and the clear potential of the scheme to deliver a mixed use urban extension on a previously developed site. The scheme is a major regeneration initiative and is a true commitment: planning permission has been granted, the site is in the hands of an active and experienced development company, significant and substantial infrastructure has been installed and development is underway.

Policy SP1 (ii) also makes it clear that the DLDP's priority is to secure the regeneration of previously developed sites before greenfield land is released for development. This is sensible and sustainable and reflects a strong and established national policy direction.

There are, however, some concerns about some of the plan's language, the clarity of its starting point and some of its individual policies. As such objections have been made to ensure that the significance of the City's key projects is recognised and the development of previously developed sites, such as Glan Llyn, remains a priority throughout the plan period. This sees changes proposed to some of the plan's most strategic policies as well as some of its detailed allocations. The changes are straightforward and see greater emphasis of the qualitative benefits from redevelopment projects, as well as a more open presentation of housing requirements and responses and the removal of what are clearly unnecessary, additional greenfield housing allocations. These changes will improve the plan and help to make it sound.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Objections are also raised relating to Policy EM2, which we believe, in part, is an unnecessary duplication of housing policy, given the identification of the Glan Llyn site (residential) under Policy H1.

I trust this is clear and I look forward to receiving confirmation of the registration of our representations in due course.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>								
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1	1	I think the LDP is sound.								No
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13	13	Test of Soundness C2, CE1, CE2, CE4								
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<i>Item</i>	<i>Question</i>									
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Tick-box reply

6	6	A new policy								Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D7//GP03	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.38

Policy: GP03

Summary: Recommends alteration to Policy GP03

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number GP3		
3	3	Paragraph or section number(s) (iii)		
7	7	A new paragraph or new text.		Yes
14	14	Representation Policy GP3 – General Development Principles – Service Infrastructure Criterion (ii) of Policy GB3 refers to capacity within the public foul sewer system and effectively would prevent development where deficiencies exist or satisfactory improvements cannot be provided. Whilst developments need to be served by appropriate infrastructure, there is significant concern that Policy GP3 places too much emphasis on the advice of existing statutory undertakers in determining whether that infrastructure exists. The concern in this respect is that planning applications (and regeneration) could be held up whilst solutions are considered with statutory undertakers. Where technical reports support applications and demonstrate acceptable service infrastructure (or solutions to provide upgrades) the grant of planning permission should not be delayed, subject to appropriate and relevant conditions. On this basis we recommend that criteria (ii) of Policy GP3 is deleted		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C2, CE1, CE2, CE4		
6	6	A new policy		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D8//GP01	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.36

Policy: GP01

Summary: Recommends alteration to Policy GP01

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number GP1		
3	3	Paragraph or section number(s) (ii)		
7	7	A new paragraph or new text.		Yes
14	14	Representation Policy GP1 – General Development Principles – Climate Change Reference is made within Policy GP1 to development proposals being designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including site energy provision, where possible. Whilst the aim to minimise energy consumption is supported, the provision of renewable, low or zero carbon energy sources within development sites is in its infancy and experience suggests that it is proving very difficult to find viable solutions for on site renewable energy production. The indication that on site energy provision should be made, where possible, should also include the caveat that it should also be viable and practical. In this context, GP1(ii) should be changed to read: Development proposals should be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where viable and practical.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C2, CE1, CE2, CE4		
6	6	A new policy		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1466.D9//EM02.01	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Council Officer: DLD

Document: Deposit Plan, p.77

Site: 426/ Glan Llyn

Delete Site

Policy: EM02.01

Map: Proposals Plan - East EM2(xii)

Summary: Recommends alterations to Policy EM02

Item	Question	Representation Text	Response
2	2	Policy Number EM2	
3	3	Paragraph or section number(s) (i) and (ii)	
7	7	A new paragraph or new text.	Yes
11	11	Site Name Glan Llyn, Llanwern/ Llanwern Former Steelworks	
12	12	Site Reference EM2 (xii)	
14	14	Representation Objection to Policy EM2 – Regeneration Sites	
<p>The Glan Llyn and former Llanwern Steelworks sites are also referred to under EM2 as regeneration schemes to be encouraged, as follows:</p> <p>Glan Llyn, Llanwern, 194 hectares for residential community, commercial and leisure uses. Llanwern Former Steelworks, Eastern End, 51 hectares for B1, B2 and B8 uses.</p> <p>Whilst the principle of allocating the site for regeneration purposes is supported, the dual allocation of the site for residential use under Policy H1(47) and for residential, community, commercial and leisure use under Policy EM2, could confuse readers of the plan (about the basic potential of Glan Llyn). The site is a commitment - planning permission has been granted and development is underway. As a consequence, there is no need to duplicate the commitment as part of regeneration policy EM2. It is, therefore, requested that reference to Glan Llyn, under EM(i) is deleted.</p> <p>Reference under EM2 to the regeneration site at the eastern end of the Steelworks can be supported, because it reflects the outline planning permission and masterplan for the site. Reference is also made under Policy EM2 (ii) where 51 hectares are identified for B1, B2 and B8 uses. There is no objection to EM(ii) being retained, although the text should be amended to reflect the true area of the site which is correctly identified under the supporting text (paragraph 6.27) as 39.5Ha.</p> <p>On this basis the changes we recommend to Policy EM2 are:</p> <p>to delete EM2(i) and</p> <p>revise EM2(ii) to reflect the correct size of the employment area as 39.5Ha.</p>			
15	15	Do you want to speak at Public Examination?	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
	Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers, allocations or new greenfield sites is informed fully.									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.							No		
13 13	Test of Soundness									
	C2, CE1, CE2, CE4									
<i>Item Question</i>								<i>Tick-box reply</i>		
10 10	Delete an existing site.							Yes		

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D10//H01.56	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Council Officer: DLD

Document: Deposit Plan, p.64

Site: 425/ Woodland Site

Delete Site

Policy: H01.56

Summary: Recommends alterations to Policy H1

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number H1	
3	3	Paragraph or section number(s) Sites 56 and 57	
7	7	A new paragraph or new text.	Yes
11	11	Site Name Woodland Site Ringland and Hartridge Farm Road	
12	12	Site Reference H56 and H57	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
		Policy H1								

Policy H1 is a key policy. Once all of the sources of housing are accounted for, we calculate that it makes provision for a total of 11,937 new dwellings over the plan period (to 2026). This is substantially more land than is required:

If the most recent WG projection is used, land for a total of 7,500 new homes is required. If unchanged, Policy H1 provides for about 4,500 more than this or very nearly 60% more than the number required in WG's most up to date projections.

If a figure of 8,750 is used, then the over provision is about 3,200 or 36.4%

It is clearly a decision for Council's whether they decide to over or under provide for housing (against the most up to date projections). However this is a significant over provision and whilst there is some very brief explanation given in the plan, this neither recognises the scale of the difference nor explains the need for it.

This is important because the Council has a number of sites with planning permission that it wishes to bring forward for redevelopment. Glan Llyn is at or near the top of that list and further unnecessary allocations (either because of type of land or location) could deflect attention away from these priorities. We know that the Council agrees with this basic proposition from earlier statements in the plan.

This is significant because there are two substantial allocations for new or additional greenfield sites, under Policy H1. These are at the Woodland Site, Ringland (H1(56) – 300 units) and at Hartridge Farm (H1(57) – 290 units). These should be deleted from the plan as they are not needed and could have an adverse impact on the delivery of key previously developed sites including Glan Llyn. The impact on housing numbers would be minimal – and even if the over provision is accepted in principle, the effect of removing these two sites would only be to reduce this to about 50% above what is required if the starting point is 7,500 homes or about 30% if it is 8,750. Deletion of the new Greenfield sites would therefore improve the performance of the plan (and the principles and sequence it wishes to follow) without threatening strategy at any level.

Looking more positively at the terms of Policy H1, we can confirm our full support for the allocation of the Glan Llyn site under H1(47), which is identified to deliver nearly 3,000 dwellings within the plan period. This is in accordance with the outline planning permission granted for the redevelopment of the site. Significant progress has already been made towards delivering the framework for this level of housing provision and we see a trajectory which reasonably increases the rate of provision with key events and an improvement in market demand and conditions.

Even if there is doubt about performance (and experience suggests that some promoters will wish to alarm the Council about delivery), the allocations under H1 are so large that, even with the removal of the greenfield releases both the 7,500 figure and 8,750 increase can be retained with a substantial contingency. Although we cannot see how it can, if any residual doubt remains after this, then the right solution would be to reserve any greenfields sites for release at later stages in the plan. This follows the approach we adopted in our comments on Policy SP10.

In this light, our comments on, objections to or recommendations for Policy H1 are as follows:

To support H1 (47)

To insert a "total" figure to the table to make the extent of the DLDP's over provision for new housing clear

To consider the introduction of a phasing dimension to the allocations

To delete allocations H1 (56) and H1 (57)

Or to reserve these two sites for release only if needed.

15	15	Do you want to speak at Public Examination?								Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
	Glan Llyn is the largest single housing site within the city. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.								No	
13 13	Test of Soundness									
	C2, CE1, CE2, CE4									
<i>Item Question</i>									<i>Tick-box reply</i>	
6 6	A new policy								Yes	
10 10	Delete an existing site.								Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1466.D11//SP10	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.21

Policy: SP10

Summary: Considers that Policy SP10 has made for overprovision of housing.

Item	Question	Representation Text	Yes
2	2	Policy Number SP10	
7	7	A new paragraph or new text.	Yes
14	14	Representation Policy SP10 – House Building Requirement SP10 states that sufficient land will be made available for a total of 8,750 dwellings, over three 5-year periods. Paragraph 0.10 at the beginning of the plan states that, according to the most recent Welsh Government projections, the Council needs to identify or allocate land for 7,500 dwellings. Whilst there is some explanation for the excess this does not alter the basic housing requirement (which is the title of this policy) and nor does it justify a decision to plan for a higher level of households. As a result the plan's housing strategy should start from the 7,500 figure (and it should use this figure in Policy SP10). As with the Unitary Development Plan, it should also be made clear that the three phases will be distinct or self contained. This means that any over or under performance in one period will not have a consequence for later phases. The remainder of the policy states that land will be provided for through a combination of committed sites, the Eastern Expansion Area, new allocations and wind fall sites. When these are added together (see comments under Policy H1), the plan proposes a significantly higher amount of land for housing than either the 8,750 or 7,500 figures. If all the new allocations survive, then the sequence in points i – iv should be made clearer: at the moment it allows no distinction between the new allocations in Policy H1. This fault can be effectively resolved by clarifying that the preference in each category will be for the redevelopment of previously developed sites rather than the release of greenfield land. This installs the proper planning sequence. An alternative, if the Council was adamant that new greenfield sites are necessary, is to ensure that they are only made available later in the plan period (to provide a safeguard in the very unlikely event that the sites do not perform). In this light our recommended changes are: To make the total at the beginning of the Policy add up to 7,500 (with the three periods taking 2,500 additional dwellings each) A statement that the three periods will be self contained, with performance in one phase having no bearing on the following phases To make it clear that a proper sequence to land release and development is to be followed in each category (where this is possible) and that any greenfield sites will be kept in reserve and will be released only if there is a demonstrable failure of the City's stock of previously developed sites	

15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Glan Llyn is the largest single housing site within the city. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness C2, CE1, CE2, CE4									
<i>Item Question Tick-box reply</i>										
6 6	A new policy		Yes							
1466.D12//H01	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Supports allocation of site H47 under Policy H1, however objects to other allocations within Policy H1

Item Question	Representation Text	
2 2	Policy Number H1	
3 3	Paragraph or section number(s) Site 47	
11 11	Site Name Glan Llyn - Former Llanwern Steelworks	
12 12	Site Reference H47	
14 14	Representation	
15 15	Do you want to speak at Public Examination?	Yes
16 16	Subject to speak on at Examination Glan Llyn is the largest single housing site within the city. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.	
<i>Item Question Soundness Test</i>		
1 1	I think the LDP is sound.	No
13 13	Test of Soundness Whilst H47 is supported, other objections indicate that the plan is unsound in other regards.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1466.D13//H16.03	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to the Gypsy and Traveller allocation at Former Army Camp Site, Pye Corner, Nash.

Item Question Representation Text

2 2 Policy Number
Policy H16

4 4 The Proposals Map
Proposals Map East

14 14 Representation

As outlined in PPW and the Welsh Government's circular, if a site is not suitable for a form of residential use, it is not suitable for a Gypsy and Traveller site. Our analysis of the three sites demonstrates that each site could not be considered suitable for housing use and, as such, cannot be suitable for Gypsy and Traveller use.

For the reasons set out above, we conclude that the three sites contradict national guidance set out by the Welsh Government and for this reason we question the suitability of the three sites for Gypsy and Traveller use and respectfully request that further consideration is given to other more suitable alternative sites to meet the identified need. A wider area should be considered for this search.

Change required: delete sites (ii) and (iii) of Policy H16.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

The proposed allocation of the two sites referred to above for Gypsy and Traveller use are unsuitable. They raise significant issues and SMDL is a key stakeholder. We also have significant experience of development issues in the area and the clear need to be involved in discussions about its future.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

Please see covering letter, dated 28 May 2012. The plan fails on the following tests: C1, C2, CE1, CE2 and CE4.

Item Question

Tick-box reply

6 6 A new policy

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1466.D14//H01.57	St Modwen Developments Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	
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Document: Deposit Plan, p.64

Site: 438/ Hartridge Farm Road

Delete Site

Policy: H01.57

Summary: Object to the allocation of H1(57) Hartridge Farm Road.

Item	Question	Representation Text
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2	2	Policy Number
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H1

3	3	Paragraph or section number(s)
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Sites 56 & 57

7	7	A new paragraph or new text.
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11	11	Site Name
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Woodland Site Ringland and Hartridge Farm Road

12	12	Site Reference
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H56 & H57

14	14	Representation
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This form should be read in conjunction with the covering letter submitted on behalf of St Modwen Developments Ltd, dated 28/5/12, which sets out the full background and justification for the representations.

Policy H1 is a key policy. Once all of the sources of housing are accounted for, we calculate that it makes provision for a total of 11,937 new dwellings over the plan period (to 2026). This is substantially more land than is required in this light, our comments on, objections to or recommendations for Policy H1 are as follows:

- a) To support H1(47)
- b) To insert a total figure to the table to make the extent of the DLDP's over provision for new housing clear.
- c) To consider the introduction of a phasing dimension to the allocations
- d) To delete allocations H1(56) and H1(57)

15	15	Do you want to speak at Public Examination?
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Yes

16	16	Subject to speak on at Examination
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Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield is informed fully.

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness
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Plan fails C2, CE1, CE2 & CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>		<i>Tick-box reply</i>								
6 6	A new policy									Yes
10 10	Delete an existing site.									Yes

1478.D1/5.11/H02 Design Commission for Wales

24/05/2012

E

M

Document: Deposit Plan, p.65, para.5.11

Policy: H02

Summary: Points out a possible error in Policy H02 which makes reference to Building for Life standards when it should be Lifetime Homes.

Item Question *Representation Text*

14 14 Representation

On page 65 you refer to Building for Life standards when I think you mean Lifetime Homes..... the differences are below.

<http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/building-for-life>

Building for Life - Building for Life is the national standard for well-designed homes and neighbourhoods.

<http://www.lifetimehomes.org.uk/>

The Lifetime Homes standard is a set of 16 design criteria that provide a model for building accessible and adaptable homes.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1501.D1/5.9-5.10/	Binnersley, Mrs A	Asbri Planning		25/06/2012	<input type="checkbox"/>	E	O		M	
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Additional material submitted

SA/SEA submitted

Document: Deposit Plan, p.62, para.5.9-5.10

Site: 289/ Land adj. Parkwood Close

New Site

Policy: H01

Map: Inset 27: Caerleon Inset Plan

Summary: To include Candidate Site 1501.C1 on Land Adj Parkwood Close as a housing site.

Item	Question	Representation Text
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2	2	Policy Number H1
---	---	---------------------

4	4	The Proposals Map
---	---	-------------------

Yes

11	11	Site Name Land adj Parkwood House, Caerleon
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12	12	Site Reference 1501.C1
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14	14	Representation
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Settlements such as Caerleon, which function in their own right and which have a sustainable range of facilities are regarded as 'sustainable settlements' in various Local Development Plans in Wales and provision for appropriate growth is made. For this reason Policy H1 is objected to on the grounds that further provision, either by specific site allocations or by favouring amendments to the settlement boundaries for a sustainable mix of housing should be identified in Caerleon.

In the context of the above, supporting paragraph 5.9 refers to the likely contribution from small sites, whilst 5.10 refers to an allowance of 50 units a year which are estimated to come forward as part of a 'windfall allowance' for infill and windfall sites. With urban and settlement boundaries remaining as they were from the Unitary Development Plan, such figures are unlikely to be realised given the number of windfall sites already associated with large brownfield releases.

The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.

15	15	Do you want to speak at Public Examination?
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Yes

16	16	Subject to speak on at Examination
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To put the case forward for the site's inclusion directly before the Inspector

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness CE2, CE4
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Item	Question
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Tick-box reply

8	8	Add a new site.
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1501.D2//SP05	Binnersley, Mrs A	Asbri Planning		25/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.18

Site: 342/ Land Adj Park House

Boundary Change

Policy: SP05

Map: Inset 27: Caerleon Inset Plan

Summary: Objection to policy SP5 Countryside and to include Candidate Site 1501.C1

Item Question Representation Text

2 2 Policy Number
SP5

4 4 The Proposals Map

Yes

11 11 Site Name
Land adj Parkwood House, Caerleon

12 12 Site Reference
1501.C1

14 14 Representation

The site is bounded by existing development on two sides, with residential and utilities forms of development. To the west the development would not extend beyond the existing building line established by Parkwood House and residential development along the western edge of Trinity View. As such, the inclusion of the site beyond the settlement boundaries shown and in open countryside is inappropriate given the site's characteristics and its degree of containment and firm boundary to the north, in the form of Lodge Wood. On this basis, Policy SP 5 – Countryside, is objected to.

The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

To put forward for the site's inclusion directly before the Inspector.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2,CE4

Item Question

Tick-box reply

8 8 Add a new site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1501.D3//SP10	Binnersley, Mrs A	Asbri Planning		25/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Site:

Policy: SP10

Map: Inset 27: Caerleon Inset Plan

Summary: Object to Policy SP10 over the over restriction of brownfield strategy and propose to include Candidate Site 1501.C1

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Tick-box reply</i>
2	2	Policy Number SP10	
4	4	The Proposals Map	Yes
11	11	Site Name Land adj Parkwood House, Caerleon	
12	12	Site Reference 1501.C1	
14	14	Representation Whilst it is acknowledged that the site in question would not contribute a major element of the growth proposed in the Plan Strategy, Policy SP10 – House Building Requirement is, nevertheless, objected to as the 'brownfield' led strategy in restricting appropriate levels of development in sustainable settlements such as Caerleon, does not provide for a sufficient range and choice of housing. This point is expanded upon in the objections to Policy H1. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination To put the case forward for the site's inclusion directly before the Inspector	
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE2, CE4	
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
6	6	A new policy	Yes
8	8	Add a new site.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1501.D4//SP07	Binnersley, Mrs A	Asbri Planning		25/06/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.19		Site: 343/ Land Adj Park House		Boundary Change						
Policy: SP07		Map: Inset 27: Caerleon Inset Plan								
Summary: Objection to policy SP7 Green Wedge and propose to include Candidate Site 1501.C1										

Item Question	Representation Text	Soundness Test
2 2	Policy Number SP7	
4 4	The Proposals Map	Yes
5 5	Inset Plan(s)	Yes
11 11	Site Name Land adj Parkwood House, Caerleon	
12 12	Site Reference 1501.C1	
14 14	Representation Planning Policy Wales (PPW) – Edition 4, Feb 2011, suggests that green wedge policies and boundaries should be reviewed as part of the Development Plan review process. At paragraph 4.7.12 PPW states that: "In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries. Green wedge policies should be reviewed as part of the development plan review process." PPW makes it clear that only land that is strictly necessary to fulfil the purpose should be included within a green wedge and that clearly identifiable features should be used to establish 'defensible boundaries'. It is clear that the inclusion of the site within a proposed green wedge is contrary to the above as its development would not prejudice the gap which exists between Newport and Malpas. On this basis Policy SP 7 is objected to. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site	
15 15	Do you want to speak at Public Examination?	Yes
16 16	Subject to speak on at Examination To put the case forward for the site's inclusion directly before the Inspector	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness CE2,CE4	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.									Yes

1534.D1//CF07 Appleton, Mr David 23/04/2012 E S M

Document:Deposit Plan, p.103

Policy: CF07

Summary: Support the designation of allotment outside settlement boundary in Rhiwderin

Item Question Representation Text

14 14 Representation

Firstly, I support the designation of the new allotment site, in Rhiwderin, as outside the urban boundary. Further development of this area would be disastrous for Rhiwderin village and the local area. The local amenities, schools, doctors, roads are already stretched to cope with the current population as it is.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1534.D2 Appleton, Mr David E O M

Document:Deposit Plan, p.0

Summary: Object to Candidate Sites within Rhiwderin and Rogerstone area

Item Question Representation Text

14 14 Representation

I also object to the inclusion of the other candidate sites, between Rhiwderin & Rogerstone, for the same reasons as above. (Rep 1534.D1) There are several brownfield sites in the Newport area which can be developed without spoiling the green field areas. Developing brown field sites would benefit Newport as a whole, providing housing and tidying up unsightly areas.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D1//SP01	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.14

Policy: SP01

Summary: Support the general aims of the plan - sustainable development

Item Question Representation Text

14 14 Representation

I support the general aims of the plan to maximise the use of previously developed brownfield sites in preference to Greenfield (03) , protect the green spaces (09), regenerate the fine architecture in the City (05) and introduce a sustainable development strategy.

15 15 Do you want to speak at Public Examination?

No

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1600.D2//CE01 White, Cllr Richard

28/05/2012 E S M

Document:Deposit Plan, p.47

Policy: CE01

Summary: Support extension of the Green Belt

Item Question Representation Text

14 14 Representation

Locally I support the northern extension of the Green Belt to the M4 (2.5)and would hope that Cardiff would reciprocate by introducing sections of green belt on their side of the border.

15 15 Do you want to speak at Public Examination?

No

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1600.D3//SP16	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.27

Policy: SP16

Summary: Support the Duffryn Link road

Item Question Representation Text

14 14 Representation

I also strongly support the construction of the missing Duffryn Link of the Southern Distributor Road (018) as this will alleviate traffic congestion at Ebbw Bridge and Tredgar roundabouts, a local source of annoyance and also, in conjunction with the Queensway improvements to the east of Newport, provide an emergency route if the M4 is obstructed from junction 30 through to junction 23A and an opportunity for traffic requiring access to Newport Docks, Newport South and the City Centre to be signposted off at these junctions thus reducing traffic on the M4 where it is thought to be most busy. This will also assist in the provision of a Park and Ride at the proposed Coedkernew railway station.

15 15 Do you want to speak at Public Examination?

No

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Not Ticked

1600.D4//SP03 White, Cllr Richard

28/05/2012 E C M

Document:Deposit Plan, p.16

Policy: SP03

Summary: Comment that development should not increase the risk of flooding

Item Question Representation Text

14 14 Representation

SP 3. The premise that development should not increase the risk of flooding elsewhere is very relevant to the Wentloog and Caldicot Levels to ensure that the existing ree systems are not overloaded

15 15 Do you want to speak at Public Examination?

No

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D5//SP04	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.17

Policy: SP04

Summary: Support of Policy SP4 - Water Resources

Item Question Representation Text

14 14 Representation
SP 4. (iv) An important consideration in many areas

15 15 Do you want to speak at Public Examination?
Not Ticked

No

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

No

1600.D6//SP05	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.18

Policy: SP05

Summary: Support the prevention of undesirable development in the Countryside

Item Question Representation Text

14 14 Representation
SP 5. Extremely important for the prevention of undesirable development in the Countryside

15 15 Do you want to speak at Public Examination?
Not Ticked

No

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D7//SP06	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.19

Policy: SP06

Summary: Support Policy SP6 - Green Belt

Item Question Representation Text

14 14 Representation
SP 6. Very welcome and fully supported

15 15 Do you want to speak at Public Examination?
Not Ticked No

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked No

1600.D8//SP07	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.19

Policy: SP07

Summary: Support Policy SP7 - Green Wedges

Item Question Representation Text

14 14 Representation
SP 7 Very welcome and fully supported

15 15 Do you want to speak at Public Examination?
Not Ticked No

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D9//SP08	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.20

Policy: SP08

Summary: Support Policy SP8 - Special Landscape Areas

Item Question Representation Text

14 14 Representation
SP 8 Very welcome and fully supported

15 15 Do you want to speak at Public Examination?
Not Ticked

No

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

No

1600.D10//SP09	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.21

Policy: SP09

Summary: Support policy SP9 - conservation of the natural and historic environment

Item Question Representation Text

14 14 Representation
SP 9 Very welcome and fully supported

15 15 Do you want to speak at Public Examination?
Not Ticked

No

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1600.D11//SP10	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.21

Policy: SP10

Summary: Support policy SP10 House building requirement to maintain Green Belt, Countryside and Special Landscape Area

Item Question Representation Text

14 14 Representation
 SP 10 (iv) Fully supported to maintain SP6,7and 8. It would be better if the last sentence said "housing development of any kind..."

15 15 Do you want to speak at Public Examination? No
 Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. No
 Not Ticked

1600.D12//SP16	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.27

Policy: SP16

Summary: Questioning whether the M4 improvements at Junction 28 is now necessary

Item Question Representation Text

14 14 Representation
 SP 16 (i) Is this now necessary?

15 15 Do you want to speak at Public Examination? Neither
 Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. Neither
 Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D13//SP16	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.27

Policy: SP16

Summary: Support of the Duffryn Link road

Item Question Representation Text

- 14 14 Representation
SP 16 (iii) and 2.60 A logical solution in many ways
- 15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

- 1 1 I think the LDP is sound.
Not Ticked

Neither

1600.D14//GP01	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.36

Policy: GP01

Summary: Support of policies GP1-3 Climate Change, General Amenity amd Service Infrastructure

Item Question Representation Text

- 14 14 Representation
GP1-3 Very important policy statements
- 15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

- 1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

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Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D15/3.19/GP	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.39, para.3.19

Policy: GP04

Summary: Importance of adopting roads in residential developments

Item Question Representation Text

14 14 Representation

GP 4 (iv) Parking on estates can be a problem if adequate spaces are not provided for residents and visitors eg Celtic Horizons, Coedkernew

3.19 It is important that roads are adopted. Unadopted roads are a major concern to residents who live on them and can cause maintenance problems between neighbours..

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1600.D16//GP05 White, Cllr Richard

28/05/2012

E

S

M

Document:Deposit Plan, p.40

Policy: GP05

Summary: Support that the countryside and land for food production is recognised

Item Question Representation Text

14 14 Representation

GP 5 (iv & vii). It is welcome to see that the countryside and land for food production is recognised for it's significance.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1600.D17//H13	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.71

Policy: H13

Summary: Over restriction of threshold for extensions to properties within the Countryside

Item Question Representation Text

14 14 Representation

CE 1 & CE 2 (& H13). In Items 4.1 & 4.2 it states that more than a 30% increase in size of a dwelling will not be permitted. In cases of isolated dwellings which cannot be viewed from a public vantage point I believe this restricts owners of such properties unfairly and may deter wealthy businessmen from moving to this type of property resulting in a possible loss to the City. It has also to be made clear to potential purchasers of properties in these areas if the property they intend to purchase has already been extended as some potential purchasers buy with an intention to extend only to find out when they are committed that an extension is not possible.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1600.D18//CE03	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.48

Policy: CE03

Summary: The imporantance of developments considering main routes in their design

Item Question Representation Text

14 14 Representation

CE 3. Developments should provide a pleasing aspect to main routes and not consider them as a back yard.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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1600.D19/4.14/CE	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E			M	
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Document:Deposit Plan, p.49, para.4.14

Policy: CE05

Summary: Clarification as to whether the policy would encourage food production on Environmental Spaces or whether this should refer to allotments

Item Question Representation Text

14 14 Representation

CE 5. Could 4.14 give developers the impression that it is acceptable to produce food by any method, ie. Greenhouses, on Environmental green space or is it supposed to mean allotments?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1600.D20//CE08	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	
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Document:Deposit Plan, p.53

Policy: CE08

Summary: Support the policies which seek the protection of historic environment

Item Question Representation Text

14 14 Representation

CE8, CE 9 & CE 10. Historic and archeological protection is important for future generations.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D21//CE13	White, Cllr Richard			28/05/2012	<input type="checkbox"/>		S		M	

Document:Deposit Plan, p.58

Policy: CE13

Summary: Support the control of development of the Gwent Levels and the use of renewable energy on the existing building stock

Item Question Representation Text

14 14 Representation

CE 13 & 14. A positive control on development on the Levels is welcome as is the use of renewable energy systems on existing buildings.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1600.D22//H02 White, Cllr Richard

28/05/2012 E C M

Document:Deposit Plan, p.65

Policy: H02

Summary: The need for new developments to accommodate energy generation through design

Item Question Representation Text

14 14 Representation

H 2. Should new developments be designed with south facing roofs where ever possible to accommodate energy generating panels?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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1600.D23//H05	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E			M	
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Document:Deposit Plan, p.66

Policy: H05

Summary: Need to resist exception sites within Green Belt and Green Wedge

Item Question Representation Text

14 14 Representation

H 5. The last sentence in para 5.15 is very important to prevent the gradual encroachment of the Green Belt which is already taking place in and around Peterstone Wentloog. The use of the term "exception sites" needs to be resisted in relation to green belt and green wedge land.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1600.D24//H08	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.68

Policy: H08

Summary: Highlighting the problem with parking associated with conversion to multiple occupation

Item Question Representation Text

14 14 Representation

H 8. The on street parking problems are often the result of this type of development.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D25//H10	White, Cllr Richard				<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.69

Policy: H10

Summary: The suitability of the time based threshold for resisting conversion of agricultural buidlings

Item Question Representation Text

14 14 Representation
H 10 (ii). Is thirty years a long enough period to resist conversion of any type of modern farm building eg. The steel frame and metal clad type?

15 15 Do you want to speak at Public Examination? Neither
Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. Neither
Not Ticked

1600.D26//H15.01	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document:Deposit Plan, p.71

Policy: H15.01 Coedkernew

Summary: Local objection to the site at Coedkernew

Item Question Representation Text

14 14 Representation
H 15 (i) There is huge local opposition to this suggested site as it is not considered suitable or in the correct place.

15 15 Do you want to speak at Public Examination? Neither
Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. Neither
Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D27//T2	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.83

Policy: T2

Summary: Need for transport plans to consider the implication of the wider road use

Item Question Representation Text

14 14 Representation
T 2. The knock on effect of heavy vehicles on rural roads is not always apparent at the planning stage unless the development is close to them. Transport plans should consider a wider area of road use

15 15 Do you want to speak at Public Examination? Neither
Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. Neither
Not Ticked

1600.D28/9.1/SP0	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E			M	
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Document:Deposit Plan, p.14, para.9.1

Policy: SP01

Summary: Essential that rural areas are included when promoting and improving the economic and social well being of the area

Item Question Representation Text

14 14 Representation
9.1. Essential that rural areas are included

15 15 Do you want to speak at Public Examination? Neither
Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound. Neither
Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D29//CF08	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	S		M	

Document:Deposit Plan, p.104

Policy: CF08

Summary: Support that this policy criteria is set to protect sites from residential development

Item Question Representation Text

14 14 Representation
CF 8. (iii) Essential that this distinction is made as this type of application is used as an excuse for sites where a dwelling would not otherwise be allowed.

15 15 Do you want to speak at Public Examination?
Not Ticked Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked Neither

1600.D30//CF15	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	C		M	
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Document:Deposit Plan, p.108

Policy: CF15

Summary: Possible need for new school at Bassaleg

Item Question Representation Text

14 14 Representation
CF 15. An enlarged or preferably a new school may be required at Bassaleg

15 15 Do you want to speak at Public Examination?
Not Ticked Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1600.D31//SP12	White, Cllr Richard			28/05/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.24

Policy: SP12

Summary: Highlighted demand for doctors surgery and pharmacy in the Marshfield/Castleton area

Item Question Representation Text

14 14 Representation

There is a demand for a doctor's surgery and possibly an allied pharmacy in the Marshfield/Castleton area due to the increase in population over the years. Is it possible that something could be included in the emerging LDP should a suitable site become available.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

1600.D32//GP04 White, Cllr Richard

11/06/2012 E O M

Document:Deposit Plan, p.39

Site: 328/ Adj 287 Marshfield Road

New Site

Policy: GP04

Summary: Proposal for car parking at primary school

Item Question Representation Text

14 14 Representation

A resident has written to Marshfield Community Council suggesting that the strip of and north of the old School House (287 Marshfield Road) and 290, Marshfield Road could be considered as a drop off car park for parents delivering their children to the school. As you are probably aware parking outside the school is a big problem often resulting in grid lock on Marshfield Road and vehicles having to drive onto the pavement opposite the school to pass the parked cars. Is there any possibility that this could be considered?

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1623.D1//CF10	Celtic Manor Resort			25/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.105

Site: 344/ Celtic Manor

Boundary
Change

Policy: CF10

Map: Constraints Plan - East

Summary: Object to the designation of the Celtic Manor site as Zone C2 flood zone

Item Question Representation Text

2 2 Policy Number
CF10 Celtic Manor Resort

3 3 Paragraph or section number(s)
Constriants Plan - East, April 2012

14 14 Representation

Constraints Plan - East, the plans currently issued for consultation purposes indicate large trenches of the Celtic Manor Estate where it bounds the River Usk as falling with in classification C2 as per TAN 15. Whilst this would have been a correct classification prior to development of the river corridor for the 2010 Ryder Cup Golf course, the extensive earthworks associated with the development has resulted in a land form which justifies a different classification. Celtic Manor Resort strongly believe that the correct classification should be C1 as per TAN 15. We have enclosed a letter and relevant information regarding this point, letter dated 22nd MAY 2012 from EAL (Engineering Associates Ltd) outlining the justification for this amendment to the Environmental Agency

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1623.D2//CF10	Celtic Manor Resort			28/05/2012	<input type="checkbox"/>	W			M	

Document:Deposit Plan, p.105

Policy: CF10

Summary: Suggested amendments to policy CF10 it is considered too restrictive however support the masterplan approach

Item	Question	Representation Text	Soundness Test
2	2	Policy Number	
9	9	Community Facilities and Other Infrastructure CF10 Celtic Manor	
3	3	Paragraph or section number(s)	
		Section CF10 Paragraphs (i) (ii) (iii) (iv)	
7	7	A new paragraph or new text.	Yes
14	14	Representation	
		<p>Celtic Manor Resort request the following policy / paragraphs be amended: Comments on Policy: CF10 Celtic Manor A LEISURE AREA IS DESIGNATED IN THE USK VALLEY AROUND THE CELTIC MANOR RESORT. WITHIN THIS, FURTHER DEVELOPMENT OF LEISURE USES WILL BE APPROVED SUBJECT TO: The introductory part of policy CF10 is too restrictive in that it and the explanatory text only refer to a leisure designation. It only recognises the CMR as a golf and conference centre, failing to recognise the evolution of CMR into a resort destination that may well focus on sporting excellence (not just golf) and conferences but is now more than that and going forward the emphasis for its future is firmly on it as a resort where families can come to visit the area as well as visitors that come to attend a conference or take part in a sporting activity. (i) CONSISTENCY WITH AN OVERALL MASTERPLAN TO BE AGREED WITH THE COUNCIL; Agreed (ii) THE PROPOSED DEVELOPMENT RESPECTING THE RURAL CHARACTER OF THE USK VALLEY, WHICH IS TO BE MAINTAINED (insert - or improved); Suggest that policy CF10 (iii) be amended to include the words or improved at the end. (iii) ANY BUILT DEVELOPMENT BEING (insert - either) ESSENTIAL, (insert -complimentary,enabling or ancillary) TO THE (remove - FUNCTIONING OF THE) PROPOSED USE; Object to the requirement that all built development be essential as is overly restrictive in that future schemes may be required to carry out a needs analysis which would be overly burdensome. In addition, any built development would also have to be only for leisure uses ie. Changing rooms only with sports facilities. The limitation to leisure and essential eliminates and complimentary or ancillary uses or any tourist uses, including tourist accommodation. Surely the requirement for compliance with an approved Masterplan and protection established by policies CF10 (ii) and (iii) would suffice. (iv) ANY BUILT DEVELOPMENT BEING CAREFULLY LOCATED SO AS NOT TO BE VISUALLY INTRUSIVE, ESPECIALLY WHEN VIEWED FROM MAJOR ROUTEWAYS. Agreed Suggested alterations to paragraph : 9.36 The Celtic Manor has developed into one of the (remove - foremost golfing and conference venues) (insert - foremost golfing, leisure, conference and tourist resorts in the United Kingdom), providing substantial local employment and a presence on the international scene. This was exemplified in the highly successful staging of the Ryder Cup in 2010. Further development of the area for predominantly outdoor leisure activities (remove - may) (insert - will) be acceptable, subject to their complementing the existing facilities, (remove - and) not undermining the very attractions that have made the development successful (insert - and being in accordance with a masterplan that has been approved by the Council). 9.37 (remove - A) The masterplan approach is therefore sought, whereby any proposals will have to demonstrate that they are in conformity with an overall concept. Any uses proposed will need to be appropriate for a rural area in general, and for the Usk Valley in particular. Residential development (insert - other than for guest or staff accommodation or as an enabling development) will not therefore be appropriate, nor any other built development not directly related to the use in question.</p>	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1666.D1//SP08	Murray, Mrs H E	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	

Additional material submitted

Document: Deposit Plan, p.20

Site: 349/ The Griffin

Boundary Change

Policy: SP08

Summary: Request that the area is removed from the Special Landscape Area

Item Question Representation Text

2 2 Policy Number

SP8 -Special Landscape Areas

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

Land at the Griffin, Bassaleg

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Policy Reference: SP8 -Special Landscape Areas

1.0 Introduction

1.1 Mrs H E Murray objects to the inclusion of land at The Griffin within the Tredegar Park Special Landscape Area designation. The land concerned is shown on the attached plan.

1.2 Inclusion of this land within the Tredegar Park Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests:

CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation; CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and

CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

LANDMAP Designation

2.1 In terms of the evidence base for the designation of the Special Landscape Areas (SLA) as referred to in the Deposit Plan there are a number of issues which need to be addressed.

2.2 Firstly the use of the LANDMAP information system in determining potential

SLAs within Newport is driven by Planning Policy Wales (2011 4th Ed) in which Paragraph 5.3.13 states that LANDMAP u** can help to inform supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design)".

2.3 However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst Planning Policy Wales states that the data should 'help to inform' supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.

2.4 In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP Information Guidance Note 1 is 'coherence.' This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of a distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.

2.5 Concern is also raised in relation to the definition of boundaries. The TACP Report -Designation of Special Landscape Areas (2009), which is appended to the Background Paper, highlighted the need for the subsequent confirmation of the detailed boundaries by the Authority.

2.6 In this regard paragraph 5.2 of the SLA Background Paper states that "The proposed SLA boundaries for the LOP are justified as being located either: along Newport Authority's administrative boundary, the proposed settlement boundary from the LOP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous".

2.7 However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach they Authority have defaulted to the use of the settlement boundaries. While in some instances edge of settlement may be justified as the boundary in special landscape terms, in the majority of cases, it appears to be used without regard to landscape quality and adjoining influences.

We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries so as to include only those landscapes worthy of protection by virtue of their special status.

Special Landscape Area Boundary

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3.1 Given the above comments on the LANDMAP assessment and subsequent definition of the boundaries proposed by the Authority it is also important to highlight that the site at The Griffin adjoins the settlement boundary of Bassaleg and in particular Bassaleg Secondary School and its physical infrastructure. It is therefore evident that the site is subject to urban and human influences. The site is also well contained within a clear defensible boundary to the east and south, comprising of the adjoining Court Wood which is designated as a SINC. Further details relating to the site characteristics are provided within the supporting Development Framework Document which illustrates the acceptability of the site for residential development.

3.2 Therefore the characteristics of the site and surrounding environment have an impact upon the site and its inclusion within the designated Tredegar Park Special Landscape Area.

3.3 It is therefore unclear whether all landscapes within the proposed designated area are worthy of equal protection, given that it relates mainly to Tredegar Park and that a more detailed assessment of the boundaries should be undertaken rather than default to the settlement boundary.

4.0 Required Change:

4.1 That the site at The Griffin be removed from the Tredegar Park Special Landscape Area.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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Due to the significant issues raised in the representations.

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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Please refer to the attached representation

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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1666.D2//SP05	Murray, Mrs H E	Boyer Planning - Cardiff		28/05/2012	<input type="checkbox"/>	P	O		M	
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Additional material submitted

Document: Deposit Plan, p.18

Site: 350/ The Griffin

Boundary Change

Policy: SP05

Summary: To include a new site within Countryside allocation

Item Question Representation Text

2 2 Policy Number
Sp5 - Countryside

11 11 Site Name
Land at the Griffin, Bassaleg

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

COUNTRYSIDE & SETTLEMENT BOUNDARY

Page: 18 Policy Reference: SP5 - Countryside

1.0 Introduction

1.1 Mrs H E Murray objects to the inclusion of land at The Griffin within the Countryside and the omission from within the settlement Boundary of Bassaleg. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:

1.3

C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales; CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow to deal with future circumstances.

2.0 Amplification

Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 – Housing Sites it is noted that whilst Newport are utilising the Welsh Government projections the implications of the Newport City Council Local Housing Market Assessment have not been fully taken into consideration.

2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

2.3 In considering the above the separate Housing submission recommends that a housing requirement be set that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. This has been estimated at a requirement of around 12,494 dwellings. In addition to this it is recommended that an additional 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates should be added. Consequently this generates an estimated requirement provision figure for the plan period of 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

2.4 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Bassaleg to incorporate the site at The Griffin would actively assist in providing a deliverable housing site to address the identified shortfall.
Planning Policy Wales

2.5 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.6 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2011 4th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.7 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.8 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2.9 The characteristics and location of the site at The Griffin accords with the relevant criteria in order to provide a sustainable settlement extension:

The site immediately adjoins the settlement boundary of Bassaleg and is subject to urban influences;

The extension of the settlement to provide residential development would be wholly compatible with the with neighbouring established land uses;

Development of the site is not constrained by physical or environmental issues;

The site is accessible to jobs, shops and services by modes other than the car, and

The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available

2.10 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at The Griffin as a housing allocation site and the consequent inclusion within the settlement boundary of Bassaleg has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.

4.0 Required Change:

4.1 That the site at The Griffin be removed from the Countryside and the settlement boundary for Bassaleg be amended to include land to the as shown on the attached plan.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination due to significant issues rasied in the representation	
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Please refer to attached representation	
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Item Question

Tick-box reply

6	6	A new policy	Yes
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8	8	Add a new site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1666.D3//H01	Murray, Mrs H E	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	

Additional material submitted

Document: Deposit Plan, p.62

Site: 351/ The Griffin

Boundary Change

Policy: H01

Summary: To amend the Settlement boundary.

Item Question Representation Text

2 2 Policy Number
SP5 - Countryside

9 9 Amend the boundaries of an existing site. Yes

11 11 Site Name
Land at The Griffin, Bassaleg

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

COUNTRYSIDE & SETTLEMENT BOUNDARY

Page: 18 Policy Reference: SP5 - Countryside

1.0 Introduction

1.1 Mrs H E Murray objects to the inclusion of land at The Griffin within the Countryside and the omission from within the settlement Boundary of Bassaleg. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:

1.3

C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales; CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow to deal with future circumstances.

2.0 Amplification

Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 – Housing Sites it is noted that whilst Newport are utilising the Welsh Government projections the implications of the Newport City Council Local Housing Market Assessment have not been fully taken into consideration.

2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

2.3 In considering the above the separate Housing submission recommends that a housing requirement be set that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. This has been estimated at a requirement of around 12,494 dwellings. In addition to this it is recommended that an additional 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates should be added. Consequently this generates an estimated requirement provision figure for the plan period of 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

2.4 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Bassaleg to incorporate the site at The Griffin would actively assist in providing a deliverable housing site to address the identified shortfall.
Planning Policy Wales

2.5 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.6 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2011 4th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.7 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.8 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

Representation Details

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2.9 The characteristics and location of the site at The Griffin accords with the relevant criteria in order to provide a sustainable settlement extension:

The site immediately adjoins the settlement boundary of Bassaleg and is subject to urban influences;

The extension of the settlement to provide residential development would be wholly compatible with the with neighbouring established land uses;

Development of the site is not constrained by physical or environmental issues;

The site is accessible to jobs, shops and services by modes other than the car, and

The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available

2.10 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at The Griffin as a housing allocation site and the consequent inclusion within the settlement boundary of Bassaleg has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.

4.0 Required Change:

4.1 That the site at The Griffin be removed from the Countryside and the settlement boundary for Bassaleg be amended to include land to the as shown on the attached plan.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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Due to the significant issues raised in the representations.

Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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Please refer to the attached representation

Item Question

Tick-box reply

8	8	Add a new site.	Yes
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Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1666.D4//H01	Murray, Mrs H E	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	

Additional material submitted

Document:Deposit Plan, p.62

Policy: H01

Summary: Need to allocate land for further housing to deal with shortfall in supply

Item Question Representation Text

2 2 Policy Number
H1 -Housing Sites (numbers)

11 11 Site Name
The Griffin, Bassaleg

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Page: 62 Policy Reference: Policy H1 Housing

1.1 On behalf of Mrs H E Murray Ltd we object to the approach taken by the Deposit LDP with regards to the housing requirement.

1.2 We consider the approach taken by the Council against the requirements of Planning Policy Wales (PPW), which sets out criteria that Local Authorities must take account of when setting their housing requirement. Whilst the Authority has used the WG projections as their starting point, they plainly ignore the implications of the Local Housing Market Assessment that they have submitted as part of their evidence base which when based on up to date information and extrapolated forward indicates a much higher level of need than provided for.

1.3 We also consider that it is inappropriate to rely upon a number of the sites identified within policy H1 that are subject to numerous constraints and have remained undeliverable for some time. A number of such sites are identified as "new allocations" whereas in reality they have been carried through previous plans with no developer interest or signs of such interest.

1.4 In this context and based on our consideration of the Plan in relation to National Policy requirements, it is our view that the housing requirement is wholly inadequate and contrary to the following tests of soundness:

- C1 in that it does not have proper regard to other plans, policies and strategies relating to the area;
- C2 in that the housing provision strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- C3 in that it does not have regard to the Wales Spatial Plan;
- C4 as it does not have regard to the relevant community strategy;
- CE1 in so far as the proposed housing provision strategy does not flow logically from the proposed strategy of the plan;
- CE2 in that this level of housing is not realistic and appropriate having considered the alternatives and is not founded on a robust and credible evidence base in terms of local need;
- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local needs and promote future economic growth.

1.5 Accordingly, in order to make the plan sound it is necessary for the Council to increase the housing requirement and to identify a robust and deliverable supply of land for housing. We set out our reasoning in the following paragraphs.

2.0 Factors Underpinning the Housing Requirement

2.1 Para 9.2.1 of Planning Policy Wales (4th edition) indicates that in planning the provision for new housing local authorities must take account of the following:

- People, Places, Futures -The Wales Spatial Plan;
- Statutory Code of Practice on Racial Equality in Housing -Wales;
- the Assembly Government's latest household projections;
- local housing strategies;
- community strategies;
- local housing requirements (needs and demands);
- the needs of the local and national economy;
- social considerations (including unmet need);
- the environmental implications, including sustainable building standards (see Section 4.11), energy, consumption, greenhouse gas emissions and flood risk;
- the capacity of the existing or planned infrastructure; and
- the need to tackle the causes and consequences of climate change.

2.2 Whilst 9.2.2 indicates that the starting point for assessing housing requirements is the latest Government Household projections but it is very clear that other sources of local evidence should be considered.

"In estimating housing requirements local planning authorities should integrate the provisions of their local housing strategies with the relevant provisions of their development plans".

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2.3 PW expressly requires that Local Planning Authorities should consider the appropriateness of the projections for their area based on all sources of evidence including the need for affordable housing identified by their Local Housing Market Assessment (LHMA). I deal with this in more detail below, however, it is evident that the LHMA relied upon by Newport is both out of date (published in 2007) and plainly inaccurate in terms of its predictions of how matters would have proceeded over the 5 years following its publication to the present day.

2.4 Based on the Planning Policy Wales requirements, it is evident that having regards to the criteria listed, the Deposit LDP has significant shortcomings in relation not only to national guidance but also other plans, the community strategy, the evidence base, housing need and the Plan's own objective. We consider below the key elements in setting a housing requirement.

3.0 Strategies and Plans

The Deposit LDP Vision and Objectives

3.1 The Deposit LDP Objectives clearly set the context for what the policies within the Plan must achieve. Objective 4 seeks to ensure that there is an adequate supply of land for housing which meets the needs of the populations. It explains that the LDP proposes a level of housing that enables everyone to have access to decent housing.

3.2 The primary role of the subsequent policies within the LDP is clearly to help achieve the strategic objectives. It is evident that in this case these are not "cascaded down" into the policies within the Plan that are intended to implement the strategy. Indeed, the approach to housing provision adopted within the Deposit LDP is based on a LHMA (absent an up to date Assessment) that plainly identifies a level of need that is higher than the level of growth proposed and comprises a significant number of sites that have proven undeliverable through the UDP process - such that there remains a residual requirement from the LDP. In that regard the plan clearly cannot achieve its own vision or objectives.

The Wales Spatial Plan (WSP)

3.3 The aspirations for the South East Region are set out in detail in the WSP, in particular the vision for the area is to create "an innovative skilled area offering a high quality of life - international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and Europe, helping to spread prosperity within the area and benefiting other parts of Wales."

3.4 To adopt a restrictive approach towards housing is fundamentally out of line with the overarching vision for the region and will not contribute towards the achievement of the main priorities identified in the WSP including Promoting a Sustainable Economy.

Local Housing needs

3.5 The LHMA submitted as evidence in support of the plan does not form a reliable source of evidence. It was published in 2007, five years before the LDP was placed on deposit and included assumptions over the deliverability of housing land between 2006 and 2011 that have proven to be an underestimation of actual delivery.

3.6 Page 27 of the LHMA sets out that the number of net additional dwellings required between 2003 and 2021 is 12,100. With 1,210 completed in 2003 to 2006, 3,630 planned between 2006 and 2011 and then a residual requirement of 7260 (726 per annum) over the 10 years between 2011 and 2021. I would note that the LDP plans for 151 dwellings less than this per annum and 1510 dwellings less over all during this period.

3.7 Furthermore, it is possible to update the calculations on behalf of the Council.

The Residual target as of 2006 was 10,890 from 2006 to 2021. Minus actual completions between 2006 and 2011 (2,561 rather than 3,630 dwellings anticipated in 2007) equates in a residual requirement between 2011 and 2021 of 8,329 dwellings (832.9 dwellings per annum). Again the LDP provision would be 258 less per annum and 2,579 dwellings less than required over the period to 2021.

3.8 If the LHMA requirement to 2021 was extrapolated forward for the plan period to 2026 then it would equate to 12,494 dwellings required over the plan period. This is significantly more than proposed by the Deposit LDP.

3.9 In the absence of any more up to date Housing Market Assessment this clearly forms a significant consideration, insofar as it is plainly the case that the Council's housing supply would not meet the requirements set out in their Local Housing Market Assessment, rather there would be a significant shortfall.

3.10 The WG "Homes for Wales" white paper indicates that if they are to be effective, LDP's require a robust evidence base and as part of this "Local authorities must assess the need for all types of housing, using up-to-date Local Housing Market Assessments." Whilst this is a consultation paper it is clear that LHMA's contribute towards the evidence base in informing policies and current policies fall short of what is desirable.

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Newport Community Strategy

3.11 The Newport Community Strategy sets out the key aspirations for the local community 2010 to 2020. The aim of the strategy is to enhance the quality of life of local communities through actions to improve their economic, social and environmental wellbeing. The Vision is to create a "proud and prosperous city with opportunities for all". This includes objectives related to create a thriving economy, for people to thrive and live in a safe and inclusive economy.

3.12 The approach taken by the Deposit LDP towards housing provision implies that the Community Strategy cannot be achieved. Indeed, the lack of basic provision of housing to meet identified needs can only be considered to be contrary to the fundamental requirements of people and can only harm the implementation of the Community Strategy. As such the LDP can only be considered to be unsound in its current form as it effectively undermines the Community Strategy for the area.

4.1 Social Considerations & Housing Requirements

4.1 The Assembly Government's vision for housing in Wales, Better Homes for

People, is that everyone should have the opportunity to live in good quality, affordable housing; be able to choose where they live; and decide whether buying or renting is best for them and their families.

4.2 In addition to the LHMA, the Local Housing Strategy update (2010) indicates that there are 5,100 households on the waiting list for affordable housing. This level of need equates to significantly more housing (regardless of tenure) than that identified by the LDP.

4.3 The Plan's strategy should be capable of dealing efficiently with a range of circumstances. By not proposing a housing requirement in line with evidence of housing need, the LDP will not be able to deal with the implications of population change, household growth and demand and will not be able to meet the housing needs of its population contrary to Welsh Assembly aspirations and the Deposit LDP Strategy.

4.4 Were the Plan not to provide an adequate level of overall housing provision this would have significant harmful social and economic effects.

4.5 It is a WG objective to tackle social exclusion and to reverse social inequalities. Access to decent housing is at the heart of social inclusion. Under provision of housing through the planning system will undermine this. The greatest impact will fall upon low income households and young people looking to become active in the housing market. Under-provision leads to overcrowding, concealed households and poor quality housing and is contrary to the objectives of the Welsh Government to secure social inclusion.

5.0 Local Economic requirements

5.1 Housing provision forms part of the supporting framework in order to support the Welsh Government's aim to increase employment and local growth.

Indeed, the WG Economic Renewal Strategy 2010 sets out the Welsh Government's objectives for helping to shape the future of the Welsh Economy and leading the Country out of recession. The programme sets out a new direction for economic renewal and is based on the understanding that the economy is "simply to dynamic to forecast credibly over the long term". As such the Strategy sets out how the WG (and other levels of Government) can help to "shape the conditions in which a dynamic economy functions, and the role the government and wider public sector can play in encouraging success in the private and third sectors".

5.2 A constrained housing market will have an inflationary impact on land and house prices - which will only exacerbate existing problems. Housing shortages and high prices will limit the ability of labour markets to develop.

This will inevitably result in shortages of skilled labour, increasing wage levels and increased long distance commuting. Such problems damage competitiveness, restrict the ability of companies to expand and deter employers from locating in the area and damage employment growth. Jobs will ultimately be lost to other regions in Wales, the UK and to Europe.

5.3 It is imperative that the Plan adopts a robust and positive approach to economic growth (and housing provision) so as to avoid the harmful effects that will occur under the present approach and importantly to avoid a continuation of existing trends that see? young local families unable to compete on the housing market due to the influx of retirees from other parts of the United Kingdom.

6.0 Housing Land Supply

6.1 Allied to our objection to the overall level of housing is our objection to the Council's housing land supply estimate which underpins the allocation of new housing land in Policy H1. Indeed, PPW is explicit that sites should be identified that are land is genuinely available or will become available for development - and importantly sites must be free or readily freed from planning, physical and ownership constraints and economically feasible for development so as to create communities where people want to live.

6.2 There are a significant number of sites that the Council envisage will be brought forward in the LDP that were identified within the UDP and remained undeveloped and classified in the latest

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JHLAS as 3(i). Where constraints exist it is unlikely that such sites will be brought forward in the LDP period as has historically been the case - this is demonstrated in consecutive Joint Housing Land Availability Studies. This emphasises the importance of ensuring a robust supply of land. I highlight several of those sites below:

1. Unimplemented UDP Sites - subject to constraints (flood risk, remediation etc), (including Glebelands, Herbert Road, Whiteheads and Crindau);
2. High density flat schemes - a number of high density flatted schemes have been mothballed in recent years or have under delivered. As such there is little justification for the inclusion of a number of schemes where there is no apparent market interest (including Penmaen Whard, Newport Athletic Club);
3. Overestimation of delivery - I note at Llanwern that based on the trajectory within the agreed Statement of Common Ground for the 2011 JHLAS, it is estimated that it would deliver 2100 dwellings during the plan period, leaving 1900 dwellings outside of the plan period not c.1000 as envisaged by the Council. In addition, it is indicated that Allt Yr Yn will comprise 200 dwellings, however, planning permission on the site was 129 units;
4. SI06 sites - there is no evidence presented to suggest that these sites will actually be brought forward.

6.3 It is our view that based on trends over the UDP period, it is highly unlikely that a number of the identified sites will deliver at the levels that Newport envisage. Should the above categorisations be born out then there would be a shortfall of between 3,000 and 4,000 dwellings on the level envisaged as being appropriate by Council i.e. the WG projection plus the flexibility allowance.

Phasing

6.4 At para 2.38 we note that Newport CC indicate that many of their brownfield sites had progressed slowly due to the economic recession between 2009 and 2011. Whereas in actual fact, many of the Brownfield sites remained undeveloped with no interest or unimplemented planning permissions through the peak of the market in the early to mid 2000's and are still categorised in 3(i) of the JHLAS. Indeed, as a sign of the constrained nature of the housing supply in Newport, the peak rate of completions was 714 in 2001 and fell as low as 340 completions in 2004 and 425 in 2005 - as generally in the UK the housing market was moving towards its peak.

6.5 The reliance upon phasing within the UDP was proven to be wholly unreliable and cannot be a basis for carrying forward through the LDP. Indeed, the strategy was rather haphazard - when the UDP required 400 dwellings per annum between 2001 and 2006 they were in fact averaging 508 completions, however, for the final five years the average was significantly below the 740 dwellings required. This resulted in an overarching shortfall of 400 dwellings of the overarching requirement not being provided - this amounts to nearly a years supply of housing not being provided. Clearly this is not acceptable in light of the significant level of housing need identified within the LHMA.

6.6 It is evident that there is no basis for a strategy of phasing in Newport, particularly not when the council should be encouraging high rates of development to meet the unmet requirements of the UDP and the high levels of housing need identified by the LHMA which were also unmet.

Flexibility Allowance

6.7 There should be an element of flexibility in the housing land supply. This is accepted within the Council's existing figures 25% component of any housing land supply estimate to reflect the fact that not all sites with planning permission or allocated in the Plan will be developed either in whole or in part within the Plan period. Planning permissions may lapse and sites may be developed for alternative purposes - as has proven to be the case through the UDP. Such an allowance for non implementation is significantly more important when considering the needs within the area and the number of UDP sites that have remained undeveloped due to constraints.

7.0 Conclusion

7.1 In our submission, and having regard to the requirements of a plan-led system and Planning Policy Wales, the Plan should seek to meet the future accommodation needs of its inhabitants which is essential if the City is to thrive as envisaged by the Community Strategy.

7.2 The implications of such a restrictive approach include lack of private sector investment, exacerbation of housing shortages and failure to achieve the key objectives of the LDP. Rather there should be a strong element of forward thinking in order to produce a sound Plan to ensure that long term issues are addressed and that needs are met in the most sustainable manner. In this context, and having regard to the matters set out herein, adopting a higher growth scenario as a basis for land allocations is essential to produce a sustainable and sound strategy which meets the needs of the County.

8.0 Required Change

8.1 That a housing requirement be set for the County that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. We estimate, based on the available indicators, around 12,494 dwellings. In addition to this figure should be added a 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates.

Representation Details

by: Representation No

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8.2 In light of the identified problems within County in terms of affordability providing to meet estimated housing requirements is essential to ensure an adequate supply of land, retain local families and young people. Constraining supply in these terms would inevitably result in a very unbalanced community profile contrary to the aims and objectives of the LDP.

8.3 Our estimated requirement provision figure for the plan period is 16,100 dwellings. We would hope that the Council will be willing to engage in meaningful discussions with parties such as ourselves to resolve any technical differences over the assumptions used prior to the Examination.

8.4 Accordingly, additional sites must be allocated in order to meet this shortfall. To that extent the land at The Griffin, Bassaleg is considered acceptable to accommodate some of the required shortfall.

8.5 The supporting Development Framework Document which has been prepared in relation to The Griffin has summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 88 dwellings along with 1.1 ha of leisure/educational development.

8.6 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP8 - Special Landscape Areas, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

8.7 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at The Griffin within the settlement of Bassaleg is deliverable. In this regard the allocation at The Griffin will assist in providing certainty over delivery and housing supply within the plan period together with alternative range and choice.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
		Due to the significant issues raised in the representations	

Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
		Please refer to the attached representation	

Item Question

Tick-box reply

6	6	A new policy	Yes
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Representation Details

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1666.D5//H01	Murray, Mrs H E	Boyer Planning - Cardiff		28/05/2012	<input type="checkbox"/>	P	O		M	
		Additional material submitted	SA/SEA submitted							
Document: Deposit Plan, p.62		Site: 294/ The Griffin	New Site							

Policy: H01

Summary: To include Land at The Griffin, Bassaleg

Item Question Representation Text

11 11 Site Name
Land at the Griffin, Bassaleg

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

1.0 Introduction

1.1 Mrs H E Murray objects to the omission of the land at The Griffin, Bassaleg as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local

Development Plan being unsound in terms of the following tests: C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

•CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

•CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The broadly rectangular shaped 7.73ha site is situated immediately adjoining the settlement boundary for Bassaleg with Bassaleg Secondary School forming the northern boundary. The western boundary is defined by The Griffin whilst the eastern boundary is defined by Court Woodland. To the south is a single residential dwelling (Ffynon-Oer).

2.2 The site consists of a small number of fields comprising of pastoral farmland intersected by hedgerows and rises in level from the western boundary, The Griffin, to the eastern boundary, Court Wood.

The facilities and amenities of Bassaleg, including a community centre, a newsagent, post office, dentist, Nisa local store, pharmacy, hairdresser, fish and chip shop and several public houses and restaurants are within close proximity. There are also recreation and employment opportunities (circa 1km) to the north and east of the site.

2.4 The site is also well served by a number of Bus stops located along the A468 Caerphilly Road providing links to both local areas as well as an inter urban bus service providing access to Newport, Caerphilly, Ystrad Mynach, Cardiff and Bargoed.

3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LOP are identified in separate submissions as briefly outlined below:

Housing Requirement

3.2 As detailed within the separate submissions made in relation to Policy H1 -Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated site as well as the requirement to meet local needs as set out within the Local Housing Market Assessment a more appropriate requirement provision figure for the plan period would be 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at The Griffin would actively assist in providing a deliverable housing site to address the identified shortfall.

Settlement Boundary

3.4 As detailed within separate representations made on Policy SP5 -Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Bassaleg. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

Special Landscape Area

3.5 Within separate representations made in relation to Policy SP8 -Special Landscape Areas it is recommended that the site be removed from the Tredegar Park Special Landscape Area and that the boundaries be revised given the sites characteristics and suitability for development.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at The Griffin.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<p>4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 88 dwellings and 1.10ha of housing and leisure/educational development at The Griffin within Bassaleg. It is therefore evident that the development of the site will seek to meet the housing need through the Development Plan period within the sustainable settlement location.</p>										
<p>5.0 Required Change</p>										
<p>5.1 That the land at The Griffin, Bassaleg is allocated for housing development within Policy H1 as a new site for 88 dwellings and 1.10ha of housing and leisure/educational development in order to meet the needs of the local community.</p>										
15	15	Do you want to speak at Public Examination?							Yes	
16	16	Subject to speak on at Examination								
<p>Due to the significant issues raised in the representations</p>										
<p><i>Item Question</i> <i>Soundness Test</i></p>										
1	1	I think the LDP is sound.							No	
<p><i>Item Question</i> <i>Tick-box reply</i></p>										
8	8	Add a new site.							Yes	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1667.D1//CE01	Bath & West Country Counties Prop Trust Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.47

Site: 223/1667.C1 Marshfield road (west of)

Policy: CE01

Map: Inset 2: Marshfield and Castleton Village
Boundary

Summary: Inclusion of Candidate Site 1667.C1

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number CE1		
3	3	Paragraph or section number(s) 4.1		
4	4	The Proposals Map		Yes
9	9	Amend the boundaries of an existing site.		Yes
11	11	Site Name Land off Marshfield Road, Marshfield, Wentlooge, Newport		
12	12	Site Reference 1667		
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site has immediate main highway frontage to Marshfield Road. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C2		
8	8	Add a new site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1667.D2/2.30/SP0	Bath & West Country Counties Prop Trust Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	
Document: Deposit Plan, p.20, para.2.30		Site: 392/ Marshfield Road	Boundary Change							

Policy: SP08

Summary: Inclusion of Candidate Site 1667.C1 removal of site from Special Landscape Area designation

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number SP8	
3 3	Paragraph or section number(s) 2.30,2.31,2.32	
4 4	The Proposals Map	Yes
9 9	Amend the boundaries of an existing site.	Yes
11 11	Site Name Land off Marshfield Road, Marshfield, Wentlooge, Newport	
12 12	Site Reference 1667	
14 14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site has immediate main highway frontage to Marshfield Road. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness C2	
<i>Item Question</i>		<i>Tick-box reply</i>
8 8	Add a new site.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Representation Details

Newport City Council Local Development Plan

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Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1667.D3/2.27/SP0	Bath & West Country Counties Prop Trust Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	
Document: Deposit Plan, p.19, para.2.27		Site: 393/ Marshfield Road		Boundary Change						

Policy: SP06

Summary: Objection to Policy SP6 Green Belt and proposal to Include Candidate Site 1667.C1

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number Sp6		
3	3	Paragraph or section number(s) 2.27,2.28		
4	4	The Proposals Map		Yes
9	9	Amend the boundaries of an existing site.		Yes
11	11	Site Name Land off Marshfield Road, Marshfield, Wentlooge, Newport		
12	12	Site Reference 1667		
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site has immediate main highway frontage to Marshfield Road. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C2		
8	8	Add a new site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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1667.D4/2.25/SP0	Bath & West Country Counties Prop Trust Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.18, para.2.25

Site: 394/ Marshfield Road

Boundary
Change

Policy: SP05

Summary: Objection to policy SP5 Countryside for proposal to include candidate site 1667.C1

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number SP5		
3	3	Paragraph or section number(s) 2.25,2.26		
4	4	The Proposals Map		Yes
9	9	Amend the boundaries of an existing site.		Yes
11	11	Site Name Land off Marshfield Road, Marshfield, Wentlooge, Newport		
12	12	Site Reference 1667		
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site has immediate main highway frontage to Marshfield Road. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C2		
8	8	Add a new site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1667.D5/5.3/H01	Bath & West Country Counties Prop Trust Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.62, para.5.3

Site: 223/1667.C1 Marshfield road (west of)

New Site

Policy: H01

Summary: To include Candidate Site 1667.C1 on Land at Marshfield Road (West of) for residential development.

Item	Question	Representation Text	Answer
2	2	Policy Number H1	
3	3	Paragraph or section number(s) 5.3 and new allocation sites	
4	4	The Proposals Map	No
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Land off Marshfield Road, Marshfield, Wentlooge, Newport	
12	12	Site Reference 1667	
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site has immediate main highway frontage to Marshfield Road. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.	
15	15	Do you want to speak at Public Examination?	No
		<i>Item Question</i>	<i>Soundness Test</i>
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	
		<i>Item Question</i>	<i>Tick-box reply</i>
8	8	Add a new site.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
1667.D6/2.35/SP1	Bath & West Country Counties Prop Trust Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.21, para.2.35

Site: 223/1667.C1 Marshfield road (west of)

Policy: SP10

Summary: To include Candidate Site 1667.C1

Item	Question	Representation Text	Tick-box reply
2	2	Policy Number Sp10	
3	3	Paragraph or section number(s) 2.35-2.39	
4	4	The Proposals Map	Yes
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Land off Marshfield Road, Marshfield, Wentlooge, Newport	
12	12	Site Reference 1667	
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site has immediate main highway frontage to Marshfield Road. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.	
15	15	Do you want to speak at Public Examination?	No
		<i>Item Question</i>	<i>Soundness Test</i>
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2	
		<i>Item Question</i>	<i>Tick-box reply</i>
8	8	Add a new site.	Yes

Representation Details

Newport City Council Local Development Plan

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1667.D7	Bath & West Country Counties Prop Trust Ltd	S.G. Williams & Associates		23/05/2012	<input type="checkbox"/>	W	O		M	
Document: Deposit Plan, p.0		Site: 396/ Marshfield Road	Boundary Change							

Summary: Propose amendment to Settlement Boundary

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number H1		
3	3	Paragraph or section number(s) 5.3 and new allocation sites		
4	4	The Proposals Map		Yes
9	9	Amend the boundaries of an existing site.		Yes
11	11	Site Name Land off Marshfield Road, Marshfield, Wentlooge, Newport		
12	12	Site Reference 1667		
14	14	Representation Paragraph 4.1 of PPW promotes sustainable development through good design and sets out objectives of good design as being related to Access, Character, Community Safety, Environmental Sustainability and Movement. Paragraph 9.3.1 of PPW sets out that new housing developments should be well integrated with and connected to the existing pattern of settlements. It goes on to state that creating ribbon development should be avoided as should the coalescence of settlements or a fragmented development pattern. The site is located adjoining an existing housing development with ready and available highway, utility and services available. The site is located within an existing community with existing and established highway and public transport links, and, existing local services such as schools and shops. The site has immediate main highway frontage to Marshfield Road. The site would provide an opportunity for a mixed use development to include open market housing, social housing, small-scale retail, community facilities and enhancement, play/park facilities, medical facilities and improvements to the local sewerage and infrastructure. There is little new development proposed within the plan on the eastern areas of the Plan, particularly as this is an existing and established community. For the above reasons, the Plan development/settlement boundary should be changed to include the site.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness C2		
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1668.D1/2.35-2.39/	Neale, I	Derek Prosser Associates		28/05/2012	<input type="checkbox"/>	P	O		M	

Additional material submitted

Document: Deposit Plan, p.21, para.2.35-2.39

Site: 180/1668.C1 Magor Road Nurseries

New Site

Policy: SP10

Map: Constraints Plan - East

Summary: Inclusion of site within urban boundary on land at Magor Road Nurseries.

Item Question Representation Text

2 2 Policy Number

SP10 (H10)

3 3 Paragraph or section number(s)

Paras 2.35-2.39

Representation Details

Newport City Council Local Development Plan

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Please see attached sheet(s)

On behalf of my Clients, Messrs Duthies, Lewis and Neal, the owners of the land identified on the attached plan, I wish to point out that the Deposit Local Development Plan is unsound and needs to be changed.

The first of the Assembly Government's objectives for housing is:-

- "to provide more housing of the right type and offer more choice."

Furthermore, the Assembly Government will seek to ensure that:-

- "the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains, and, where possible enhances important landscape and wildlife features in the development."

As openly indicated in the Deposit Plan, the supply of housing is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permission for many years and seem no nearer to be developed now. There appears to be a complacent attitude that few more sites need to be allocated, even though the end date for the Plan is 2026. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

Also, national government emphasises the need to make up the shortfall in affordable housing provision.

The dependence on brownfield sites, where development costs are higher, is in danger of not producing the required affordable housing provision because of the threat to the viability of development.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites. It accepts that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Deposit Plan provides for its housing sites to be totally concentrated within the urban boundaries of the City with no opportunities beyond the urban boundaries. In particular there are no new allocations within Langstone, even though the village has shown the capacity to absorb new development and has been provided with new employment opportunities during the past decade.

The last published Joint Land Availability Study shows the City to have land available to provide a 3.5 year land supply when set against the UDP requirements. This will not have substantially improved with permissions granted since, when the next study is published shortly. It is suggested that, compared with the past 5 year build rates, the land supply equates to 6.4 years but the build rates were constrained by insufficient range of sites available for early development, depending so much on regeneration of brownfield sites. The Council's current Deposit Plan strategy is likely to suffer the same problems.

The Study showed that only 23.8% of the dwelling units were likely to be built within 5 years whereas over 73% would not become available until after the first 5 years.

National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. The Deposit Plan does little to address the short term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above-mentioned deficiencies. One such allocation would be that identified on the attached plan. Langstone is well located on the main eastern approach to the City and has had infrastructure and employment improvements over the past decade. The Coldra Roundabout has had major improvements to improve its capacity and further development east of Langstone will enhance the City's housing supply. There are good public transport links with Newport.

While the land is largely open fields and hedgerows, its important landscape and ecological features can be retained and enhanced in the development. Its allocation has the prospect of bringing forward early affordable housing provision and could accommodate local services and facilities as required.

National Government suggests a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the planning process to allow a faster lead-in time to development. The Deposit LDP proposals do little to provide a range of housing sites offering choice, variety and quality in the short term and flexibility to deal with changes in circumstances. This site in Langstone will enhance the housing allocations and the development opportunities in Newport during the Plan period.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		No							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness C1, C2, C3, CE1, CE2, CE4									
<i>Item Question Tick-box reply</i>										
8 8	Add a new site.		Yes							
1673.D1	ADPICO	GVA Grimley				<input type="checkbox"/>	E		M	

Document:Deposit Plan, p.0

Map: Proposals Plan - East

Summary: Support inclusion of site within the urban boundary.

<i>Item Question</i>	<i>Representation Text</i>	
4 4	The Proposals Map	Yes
14 14	Representation We note that the Deposit LDP (and accompanying Proposals Map) identifies the land known as 'Slobands', Uskmouth within the defined urban boundary of Newport. This site has been subject to previous candidate site representations made on behalf of our client, ADPICO, and was assessed by the Council as Site No 25 as part of the LDP process. Whilst the site not specifically allocated in the LDP, we welcome and support its continued inclusion within the urban boundary of Newport and consider that such treatment of this important brownfield site will enable comprehensive redevelopment of the site over the life of the LDP, subject to compliance with all relevant policies of the plan. Our client looks forward to working with the Council in order to deliver the regeneration and redevelopment of this key part of Uskmouth. The proposed location of the new M4 relief road is also noted and we trust that the Council will seek to ensure that any new M4 relief road, or development within the wider are of Uskmouth, will deliver improved access provisions to this wider area in order to enable redevelopment opportunities and fulfil the potential of the wider Uskmouth area.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question Soundness Test</i>		
1 1	I think the LDP is sound.	Yes
13 13	Test of Soundness N/A	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2035.D11/T1	Associated British Ports	RPS Group PLC		24/05/2012	<input type="checkbox"/>	E	S		M	

Document: Deposit Plan, p.82

Policy: T1

Summary: Support the recognition to protect and encourage rail access at Newport Docks

<i>Item Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2 2	Policy Number T1	
14 14	Representation Support is given to Policy T1 (v) and the Council's recognition of the need to protect and encourage rail access to industrial development at Newport Docks.	
15 15	Do you want to speak at Public Examination? Not Ticked	Neither
1 1	I think the LDP is sound.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2035.D2//EM01	Associated British Ports	RPS Group PLC		24/05/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.73

Policy: EM01

Summary: Support the allocation of employment at the Docks but object to reference of the M4 relief route

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number EM1	
3	3	Paragraph or section number(s) 6.18	
14	14	Representation We note that land under AB Ports ownership at Newport Docks is allocated for employment (B1,B2 and B8)uses under Poluc EM1 (v) 'Employment Land Allocations'. Support is given to the Docks allocation for employment and the fact that the Council recognises the economic importance of the Docks in the LDP and seeks to support ABP to improve and expand its facilities in order that it can further contribute to the economic well being of the City. It should be noted that in addition to the role the Docks play in bulk handling and warehousing and strogae facilities, ABP are also actively looking to develop energy and infrastructure projects within its landholdings in support of the objectives and targets outlined in the Climate Change Strategy for Wales Suporting paragraph 6.18 to the policy however makes reference to safeguarding the M4 relief route which runs through the Docks. This route however no longer features in the Welsh Assembly Governments published major infrastructure plans for the next 10 years and it is also noted that the route has been removed from the LDP proposals map. It is therefore considered that paragaraph 6.18 should be deleted from the LDP text.	
15	15	Do you want to speak at Public Examination?	Yes
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C1,CE1,CE2	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2035.D3//CE13	Associated British Ports	RPS Group PLC		24/05/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.58		Site: 397/ Newport Docks	Boundary Change							
Policy: CE13		Map: Proposals Plan - West								
Summary: To include the docks area within the developed coastal zone area										

Item Question Representation Text

4 4 The Proposals Map
Developed Coastal Zone Boundary Yes

9 9 Amend the boundaries of an existing site. Yes

14 14 Representation

We note that land under AB Ports ownership at Newport Docks is located within the defined Developed Coastal Zone Boundary as shown on the proposal map.

The Developed Coastal Zone Boundary as shown on the proposals map which runs along the eastern side of the Newport Docks area does not however relate well to the coastline and excludes land allocated for employment uses under policy EM1(v) which should clearly be included within the boundary. The Developed Coastal Zone Boundary as shown on the Proposals Map should therefore be amended to include the full extent of the Newport Docks area.

15 15 Do you want to speak at Public Examination? Yes

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
C1

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2035.D4/2.69/SP1	Associated British Ports	RPS Group PLC			<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.30, para.2.69

Policy: SP18

Summary: Support the allocation for employment and suggest reference to associated development of compatible energy and infrastructure projects

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP18	
3	3	Paragraph or section number(s) 2.69	
7	7	A new paragraph or new text.	Yes
14	14	Representation We note that land under AB Ports ownership at Newport Docks is allocated for employment (B1,B2 and B8) uses. Support is provided to Policy SP18 'Employment Sites' and in particular supporting paragraph 2.69 which states that "Newport Docks provide a particular opportunity to provide for port related employment. One aspect of this is in energy generation, where it has locational advantages, including accessibility for fuel and distance from residential or other uses upon which there might be impact. The existing Uskmouth Power Station is of course across the river". Newport Docks are a long established operation and is a very significant economic and commercial asset to the City providing a wide variety of port related facilities and jobs. Support is therefore given to this statement and that fact that the Council recognises the economic importance of the Docks in the LDP and will support ABP to improve and expand its facilities in order that it can further contribute to the economic well being of the City. It should be noted that in addition to the role the Docks play in bulk handling and warehousing and storage facilities, ABP are also actively looking to develop energy and infrastructure projects within its landholdings in support of the objectives and targets outlined in the Climate Change Strategy for Wales. It is therefore suggested that the following wording is added to paragraph 2.69: ... "support is therefore given to the associated development of energy and infrastructure projects that are compatible with Dock operations and associated land uses".	
15	15	Do you want to speak at Public Examination?	Yes
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C2,CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2035.D5//SP22	Associated British Ports	RPS Group PLC			<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.34

Policy: SP22

Summary: Suggest reference to Policy T1 within Policies M4 and SP22 to recongise the wider transportation role of the ports above aggregates

Item Question Representation Text

2 2 Policy Number
SP22 & M4

7 7 A new paragraph or new text.

Yes

14 14 Representation

Land under AB Ports ownership at Newport Docks is a long established operation and a very significant economic and commercial asset to the City providing a wide variety of port related facilities and jobs.

It is noted that Policy SP22 (criterion ii) and Policy M4 (paragraph 10.14) which related to minerals both outline that wharves and existng rail infrastructure at Newport Docks should be protected to ensure the consitnued sustainable transportation of aggregate.

Whilst support is given to these policies, it should however be noted that in addition of the role the Docks play in the transportation of aggregates, it also transports a large variety of other products and materials. It is therefore suggested that the following wording is added to Policy SP22 and Policy M4 (paragraph 10.14). "In addition to the requirements of Policy T1....."

15 15 Do you want to speak at Public Examination?

Yes

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2039.D1	The Coal Authority			18/04/2012	<input type="checkbox"/>	E	C		M	

Document:Deposit Plan, p.0

Summary: No comments at this stage

Item Question Representation Text

14 14 Representation

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2049.D1//H01	Davies MBE, Mr Robert	RPS Group PLC		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 299/ Land South of Parc Seymour

New Site

Policy: H01

Map: Inset 14: Parc Seymour Village Boundary

Summary: To include Candidate Site 2049.C1 and amend inset boundary of Parc Seymour

Item	Question	Representation Text	Yes
5	5	Inset Plan(s) no.14 - Parc Seymour	Yes

14	14	Representation Please see attached documents for full details of the representation	
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The main changes we would like to see include:

1. Allocation of Candidate Site CS2049.C1 under policy H1 and
2. Amendment to proposals map No.14 to include CS2049.C1 in settlement boundary of Parc Seymour

Deposit Stage Comments Form -Section 3
Comments

The following representation is made in relation to the site at Parc Seymour. The site was originally submitted as a candidate site ref: CS2049.C1 . The site comprises agricultural land (0.98 ha) which lies immediately adjacent to the southern edge of the built-up edge area of Parc Seymour village. The Deposit Plan does not allocate the site for a particular use or include it within the settlement limits. It is recognised that the Deposit Plan's main strategy seeks to promote brownfield sites in preference of greenfield sites as they perform better in sustainability terms for a variety of reasons. This includes the protection of the countryside; reduce the need to travel in particular by car; and to make best of the existing infrastructure. A brownfield only strategy is not however supported. To comply with national policy the Council should seek to allocate some greenfield sites in order to provide a range and choice of housing in appropriate locations where people wish to live across the administrative area of Newport.

The Council's strategy should therefore, also support the sustainable expansion of some villages. Sites should simply not be dismissed as inappropriate simply because they are greenfield. Such sites should be considered on their merits to achieve the principle of housing choice as advanced in the policy guidance set out by the Welsh Government in Chapter 9: Housing of Planning Policy Wales (PPW, Edition 4 February 2011). It is considered that the land south of Meadowlands Close at Parc Seymour is an appropriate and suitable greenfield site to be a sustainable expansion of the village. Considerable concentration of housing has been allocated at the Eastern Expansion Area. However, we would submit that smaller scale peripheral extensions on appropriate sites in villages should also be supported. Such sites can contribute to life and economy of the village without undue detrimental impact and ensure that the range of facilities, services to support the community remain viable. The Candidate Site at Parc Seymour is ideal for a housing allocation. The site will be a natural extension to Parc Seymour as it is located immediately adjacent to the existing settlement boundary. The site has good access where the main access can be achieved via Meadowlands Close. Development at this site will provide a choice of housing in a rural location.

Notwithstanding the above, in terms of its impact on the rural location, the western half of the candidate site is well screened with existing vegetation (see attach plan ref: JCD2039:01 Site Location) and the site sits lower than the A48 and existing properties within the immediate vicinity, therefore it will not have a visual intrusion on the existing countryside. In terms of accessibility the site is located near the A48 which has good connections to the City Centre and other areas to the M4. As far as public transport is concerned bus stops are located in Greenmeadow Drive and another on the A48.

Overall, it is considered that Candidate Site CS2049.C1 should be allocated under Policy H1 of the LOP. The Development Boundary as defined on Inset Plan 14 should also be amended to include the site within the defined settlement limits of Parc Seymour. As such the Deposit LOP should be altered on the basis of this representation.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.								No	
13 13	Test of Soundness CE1,CE2 AND CE4									
<i>Item Question</i>										
8 8	Add a new site.								Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2049.D2//SP01	Davies MBE, Mr Robert	RPS Group PLC		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Objects to policy SP01 of the deposit LDP.

Item	Question	Representation Text	Yes
2	2	Policy Number SP1,SP10,H1	
7	7	A new paragraph or new text.	Yes

14 14 Representation

Please see attached documents for full details of the representation

The main changes we would like to see include:

1. LDP should make the provision for the allocation of Greenfield sites; and
2. Policies SP1, SP10 and H1 to be amended to reflect the release of greenfield sites.

Deposit Stage Comments Form -Section 3

Comments It is recognised that the Deposit Plan's main strategy seeks to promote brownfield sites in preference of greenfield sites as the Council's strategy considers them to perform better in sustainability terms for a variety of reasons. This includes the protection of the countryside; reduce the need to travel in particular by car; and to make best of the existing infrastructure.

A brownfield only strategy is not however supported by RPS. To comply with national policy the Council should seek to allocate some greenfield sites in order to provide a range and choice of housing in appropriate locations where people wish to live across the administrative area of Newport. It is our view that brownfield sites are generally less capable of providing the range and choice of housing that a successful and growing economy associated with a major city will demand. Whilst brownfield sites can be developed at varying densities the likelihood of them being situated in an attractive location for families and the middle or upper end of the market is critical if housing provision is to match economic ambition.

Brownfield sites are also expensive to develop and with greater commercial risk. Furthermore, the move towards more sustainable and zero carbon buildings and all new dwellings having to meet Code for Sustainable Homes Level 3 and obtain credits under Issue Ene 1 - Dwelling Emission Rate from 1st September 2009 for 5 or more dwellings (1st September 2010 for 1 or more dwellings) as outlined in Technical advice Note 22: Sustainable Buildings, will increase development costs on brownfield sites further and make schemes even more difficult to implement.

Accordingly, brownfield sites ability to make significant financial contribution to wider strategic aims/infrastructure via S.106 Agreements is limited. Such a strategy therefore threatens to deny the Council the opportunity of relying upon the private sector developments to fund public sector infrastructure requirements and may also harm the delivery of affordable housing. For these reasons we consider the Deposit LDP to be contrary to Test of Soundness CE2.

We also believe there is insufficient flexibility in pursuing a brownfield strategy. The Deposit LDP is therefore considered to be contrary to CE4 test of soundness. In particular it is noted that the Council relies upon the strategic brownfield housing allocation at L1anwern. This site represents nearly half the housing land supply and as such, if any unforeseen difficulties are experienced with this site, there is the potential for nearly half the housing land supply to be compromised, which will have implications to the delivery of the housing requirement figure. In light of this, we believe there needs to be increased flexibility.

It is therefore proposed that some greenfield sites need to be released to ensure viability of developments and the supply of range and choice of house types. As such, we believe additional land to be released in order to ensure a flexible land supply that can accommodate the housing requirement figure and deliver a range and choice of housing, including affordable housing. As such Policies SP1 (Sustainability), SP10 (Housing Requirement) and H1 (Housing Sites) should be amended to reflect the above.

In support of the release of greenfield sites we propose that Candidate Site CS2049.C1 at Parc Seymour be allocated. Please see our other representation made as part of this consultation specifically addressing this site.

Additional Information Submitted - Available on Request

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Yes							
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness CE1,CE2 and CE4									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2049.D3//H01	Davies MBE, Mr Robert	RPS Group PLC		28/05/2012	<input type="checkbox"/>	E			M	
Document: Deposit Plan, p.62		Site: 356/ Land South of Parc Seymour		Boundary Change						
Policy: H01		Map: Inset 14: Parc Seymour Village Boundary								
Summary: Change settlement boundary of Parc Seymour.										

Item Question Representation Text

5 5 Inset Plan(s)
No 14 - Parc Seymour

14 14 Representation

Deposit Stage Comments Form -Section 3
Comments

The following representation is made in relation to the site at Parc Seymour. The site was originally submitted as a candidate site ref: CS2049.C1 . The site comprises agricultural land (0.98 ha) which lies immediately adjacent to the southern edge of the built-up edge area of Parc Seymour village. The Deposit Plan does not allocate the site for a particular use or include it within the settlement limits. It is recognised that the Deposit Plan's main strategy seeks to promote brownfield sites in preference of greenfield sites as they perform better in sustainability terms for a variety of reasons. This includes the protection of the countryside; reduce the need to travel in particular by car; and to make best of the existing infrastructure. A brownfield only strategy is not however supported. To comply with national policy the Council should seek to allocate some greenfield sites in order to provide a range and choice of housing in appropriate locations where people wish to live across the administrative area of Newport.

The Council's strategy should therefore, also support the sustainable expansion of some villages. Sites should simply not be dismissed as inappropriate simply because they are greenfield. Such sites should be considered on their merits to achieve the principle of housing choice as advanced in the policy guidance set out by the Welsh Government in Chapter 9: Housing of Planning Policy Wales (PPW, Edition 4 February 2011). It is considered that the land south of Meadowlands Close at Parc Seymour is an appropriate and suitable greenfield site to be a sustainable expansion of the village. Considerable concentration of housing has been allocated at the Eastern Expansion Area. However, we would submit that smaller scale peripheral extensions on appropriate sites in villages should also be supported. Such sites can contribute to life and economy of the village without undue detrimental impact and ensure that the range of facilities, services to support the community remain viable. The Candidate Site at Parc Seymour is ideal for a housing allocation. The site will be natural extension to Parc Seymour as it is located immediately adjacent to the existing settlement boundary. The site has good access where the main access can be achieved via Meadowlands Close. Development at this site will provide a choice of housing in a rural location.

Notwithstanding the above, in terms of its impact on the rural location, the western half of the candidate site is well screened with existing vegetation (see attach plan ref: JCD2039:01 Site Location) and the site sits lower than the A48 and existing properties within the immediate vicinity, therefore it will not have a visual intrusion on the existing countryside. In terms of accessibility the site is located near the A48 which has good connections to the City Centre and other areas to the M4. As far as public transport is concerned bus stops are located in Greenmeadow Drive and another on the A48.

Overall, it is considered that Candidate Site CS2049.C1 should be allocated under Policy H1 of the LOP. The Development Boundary as defined on Inset Plan 14 should also be amended to include the site within the defined settlement limits of Parc Seymour. As such the Deposit LOP should be altered on the basis of this representation

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

To allow a detailed discussion of the relevant issues and to ensure the inspector can be made fully aware of the circumstances in order to avoid any misunderstanding.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE1, CE2, CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2049.D4//SP10	Davies MBE, Mr Robert	RPS Group PLC		28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.21

Policy: SP10

Summary: Objects to policy SP10 of the deposit LDP in the context of candidate site in Parc Seymour.

Item	Question	Representation Text	Yes
2	2	Policy Number SP1, SP10, H1	
7	7	A new paragraph or new text.	Yes
14	14	Representation Please see attached documents for full details of the representation The main changes we would like to see include: 1. LDP should make the provision for the allocation of Greenfield sites; and 2. Policies SP1, SP10 and H1 to be amended to reflect the release of greenfield sites. Deposit Stage Comments Form -Section 3 Comments It is recognised that the Deposit Plan's main strategy seeks to promote brownfield sites in preference of greenfield sites as the Council's strategy considers them to perform better in sustainability terms for a variety of reasons. This includes the protection of the countryside; reduce the need to travel in particular by car; and to make best of the existing infrastructure. A brownfield only strategy is not however supported by RPS. To comply with national policy the Council should seek to allocate some greenfield sites in order to provide a range and choice of housing in appropriate locations where people wish to live across the administrative area of Newport. It is our view that brownfield sites are generally less capable of providing the range and choice of housing that a successful and growing economy associated with a major city will demand. Whilst brownfield sites can be developed at varying densities the likelihood of them being situated in an attractive location for families and the middle or upper end of the market is critical if housing provision is to match economic ambition. Brownfield sites are also expensive to develop and with greater commercial risk. Furthermore, the move towards more sustainable and zero carbon buildings and all new dwellings having to meet Code for Sustainable Homes Level 3 and obtain credits under Issue Ene 1 - Dwelling Emission Rate from 1st September 2009 for 5 or more dwellings (1st September 2010 for 1 or more dwellings) as outlined in Technical advice Note 22: Sustainable Buildings, will increase development costs on brownfield sites further and make schemes even more difficult to implement. Accordingly, brownfield sites ability to make significant financial contribution to wider strategic aims/infrastructure via S.106 Agreements is limited. Such a strategy therefore threatens to deny the Council the opportunity of relying upon the private sector developments to fund public sector infrastructure requirements and may also harm the delivery of affordable housing. For these reasons we consider the Deposit LDP to be contrary to Test of Soundness CE2. We also believe there is insufficient flexibility in pursuing a brownfield strategy. The Deposit LDP is therefore considered to be contrary to CE4 test of soundness. In particular it is noted that the Council relies upon the strategic brownfield housing allocation at L1anwern. This site represents nearly half the housing land supply and as such, if any unforeseen difficulties are experienced with this site, there is the potential for nearly half the housing land supply to be compromised, which will have implications to the delivery of the housing requirement figure. In light of this, we believe there needs to be increased flexibility. It is therefore proposed that some greenfield sites need to be released to ensure viability of developments and the supply of range and choice of house types. As such, we believe additional land to be released in order to ensure a flexible land supply that can accommodate the housing requirement figure and deliver a range and choice of housing, including affordable housing. As such Policies SP1 (Sustainability), SP10 (Housing Requirement) and H1 (Housing Sites) should be amended to reflect the above. In support of the release of greenfield sites we propose that Candidate Site CS2049.C1 at Parc Seymour be allocated. Please see our other representation made as part of this consultation specifically addressing this site.	
15	15	Do you want to speak at Public Examination?	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
	To allow a detailed discussion of the relevant issues and to ensure the inspector can be made fully aware of the circumstances in order to avoid any misunderstanding.									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
	CE1, CE2, CE4									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2049.D5//H01	Davies MBE, Mr Robert	RPS Group PLC		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Objects to Policy H01 in the context of proposed candidate site in Parc Seymour

Item	Question	Representation Text	Yes
2	2	Policy Number SP1, SP10, H1	
7	7	A new paragraph or new text.	Yes
14	14	Representation Please see attached documents for full details of the representation The main changes we would like to see include: 1. LDP should make the provision for the allocation of Greenfield sites; and 2. Policies SP1, SP10 and H1 to be amended to reflect the release of greenfield sites. Deposit Stage Comments Form -Section 3 Comments It is recognised that the Deposit Plan's main strategy seeks to promote brownfield sites in preference of greenfield sites as the Council's strategy considers them to perform better in sustainability terms for a variety of reasons. This includes the protection of the countryside; reduce the need to travel in particular by car; and to make best of the existing infrastructure. A brownfield only strategy is not however supported by RPS. To comply with national policy the Council should seek to allocate some greenfield sites in order to provide a range and choice of housing in appropriate locations where people wish to live across the administrative area of Newport. It is our view that brownfield sites are generally less capable of providing the range and choice of housing that a successful and growing economy associated with a major city will demand. Whilst brownfield sites can be developed at varying densities the likelihood of them being situated in an attractive location for families and the middle or upper end of the market is critical if housing provision is to match economic ambition. Brownfield sites are also expensive to develop and with greater commercial risk. Furthermore, the move towards more sustainable and zero carbon buildings and all new dwellings having to meet Code for Sustainable Homes Level 3 and obtain credits under Issue Ene 1 - Dwelling Emission Rate from 1st September 2009 for 5 or more dwellings (1st September 2010 for 1 or more dwellings) as outlined in Technical advice Note 22: Sustainable Buildings, will increase development costs on brownfield sites further and make schemes even more difficult to implement. Accordingly, brownfield sites ability to make significant financial contribution to wider strategic aims/infrastructure via S.106 Agreements is limited. Such a strategy therefore threatens to deny the Council the opportunity of relying upon the private sector developments to fund public sector infrastructure requirements and may also harm the delivery of affordable housing. For these reasons we consider the Deposit LDP to be contrary to Test of Soundness CE2. We also believe there is insufficient flexibility in pursuing a brownfield strategy. The Deposit LDP is therefore considered to be contrary to CE4 test of soundness. In particular it is noted that the Council relies upon the strategic brownfield housing allocation at L1anwern. This site represents nearly half the housing land supply and as such, if any unforeseen difficulties are experienced with this site, there is the potential for nearly half the housing land supply to be compromised, which will have implications to the delivery of the housing requirement figure. In light of this, we believe there needs to be increased flexibility. It is therefore proposed that some greenfield sites need to be released to ensure viability of developments and the supply of range and choice of house types. As such, we believe additional land to be released in order to ensure a flexible land supply that can accommodate the housing requirement figure and deliver a range and choice of housing, including affordable housing. As such Policies SP1 (Sustainability), SP10 (Housing Requirement) and H1 (Housing Sites) should be amended to reflect the above. In support of the release of greenfield sites we propose that Candidate Site CS2049.C1 at Parc Seymour be allocated. Please see our other representation made as part of this consultation specifically addressing this site.	
15	15	Do you want to speak at Public Examination?	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
	To allow a detailed discussion of the relevant issues and to ensure the inspector can be made fully aware of the circumstances in order to avoid any misunderstanding.									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
	CE1, CE2, CE4									

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2050.D1//H10	Ballinger, Mr John	Beaver Building Surveying Ltd		23/05/2012	<input type="checkbox"/>	P	O		M	

SA/SEA submitted

Document: Deposit Plan, p.69

Site: 317/ Church Farm

New Site

Policy: H10

Map: Inset 2: Marshfield and Castleton Village
Boundary

Summary: To designate Candidate Site 2050.C1 at Church Farm.

Item Question Representation Text

9 9 Amend the boundaries of an existing site. Yes

11 11 Site Name
Church Farm, Marshfield

12 12 Site Reference
2050

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Appendix A – Site Plan

1.0Introduction

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Mr Ballinger is promoting an additional site for consideration in the LDP. The site proposed is land at Church Farm, Marshfield. The extent of the site is edged in red and a copy is attached at Appendix A.

In these representations, we are therefore objecting on the grounds that too much housing is being concentrated into the eastern expansion area, thus we have serious concerns relating to the robustness of the plan. We consider that distribution of housing growth across the City is flawed, and secondly an alternative site at the western periphery of the City should be considered to address this imbalance and deficiency in the plan.

2.0 Site Description

Marshfield is located at the western periphery of Newport and some 10km west of the centre of Newport and some 13km to the east from the centre of Cardiff. Access to the site is off Marshfield Road, which is connected off the A48 that links Newport and Cardiff and provides excellent links to the M4.

The site subject to this representation is approximately 20.25 hectares and comprises the following:

- Two parcels of land to the south of Church Farm and the complex of existing farm buildings, and lies immediately adjacent to the existing settlement of Marshfield. This land is relatively level and enjoys a frontage on to the existing highway that would facilitate the means of access. The existing hedgerows could be retained as part of any future development.
- The remaining land is sited to the north east of Church Farm and benefits from having three potential points of means of access. Two potential access points could be achieved off Church Lane with a third off Ty Mawr Lane. Again this site is level, and the hedgerows could be retained to encourage biodiversity and parts of the site could be retained for use as green open space that would continue the strong landscape framework to the site. The site could also introduce a SUDs system that could form part of a green corridor.

My client would be receptive to the part inclusion of the abovementioned sites in the plan.

Within the surrounding area there is a mix of architectural styles. The site could be sensitively developed to provide an exemplar development that will enhance the character of the area.

Marshfield has a wide range of facilities that are within easy walking and cycling distance from the site. These include a shop, church, post office, primary school, community centre and village hall.

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Regular bus services run through Marshfield and along the A48 that connects Newport to Cardiff, which are the main employment centres in this locality. It should be noted that Newport and Cardiff both have train stations. The site is therefore fully accessible by sustainable modes of transport.

It is intended that the proposed development will form part of an urban extension to the settlement of Marshfield and allow for the equal distribution of housing growth throughout the City of Newport. The site's development for housing would be fully compatible with the adjoining development and would help to ensure the delivery of new housing to the western periphery of Newport, not just concentrated in the east. The site would be immediately available for development in the new plan period.

3.0 Representation on the Plan Strategy and Strategic Policies

One of the strategic objectives of the plan is 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.

Policy H1 identifies that a total of 10,953 units estimated to be delivered within the plan period. However, a total of 5,097 of these new homes, which represents nearly 50% of all new homes are going to be concentrated in one part of the City as set out under policy SP11 (Eastern Expansion Area). We do not consider this is sustainable and will not meet the needs of the population in providing balanced communities. We have serious concerns over the robustness of the plan and that it is fundamentally flawed in concentrating nearly 50% of new homes in one area.

We therefore strongly object to Policy H1 (Housing supply) as the site that forms part of these representations is not included. Indeed no housing allocations are proposed in Marshfield, despite it being a sustainable settlement and strategically located to accommodate housing growth in the western part of Newport.

We also strongly object to Policy SP11 that concentrates a significant proportion of new housing within the eastern area of Newport.

Over the past five years due to poor market conditions we have seen the impact this has had on the provision of new housing. Indeed the signs are that the housing market will remain subdued for the next ten years, which will mirror this plan period. It is, therefore essential to build in flexibility to the strategy and in particular allow for the distribution of housing across including the western side of Newport not just heavily concentrated in one area. We contest that it is necessary to provide for a greater proportion of sites likely to be developed in the short term that includes the site proposed at Church Farm. The addition of this site as a housing allocation (over 10 dwellings) will provide such an opportunity and add to the choice and variety of sites that are considered important to the Welsh Government.

The allocation of this site would therefore provide flexibility required by the test of soundness CE4, given uncertainties in the housing market in the next ten years that mirrors this plan period.

Marshfield is a more sustainable location than the Eastern Expansion Area as it is well placed between two main employment centres, as well as enjoying excellent public transport links to both centres. In light of the existing uncertainty in the housing market, the plan is rigid and there is no degree of flexibility to deal with these challenging economic circumstances. By allocating the site in Marshfield, such provision would improve the soundness of the Plan by allowing for sufficient flexibility, and by ensuring deliverability, the strategy, policies and allocations would be realistic and appropriate, thus satisfying the test of soundness CE2.

In summary, it is considered that the spatial apportionment/distribution of housing growth across the City is fundamentally flawed. The provision of nearly 50% of new housing within the plan period to be concentrated in one area represents an over-reliance on the contribution of one area within the eastern part of the City to deliver new housing over the plan period in challenging economic times. This raises serious concerns over the soundness and robustness of the plan. Accordingly it is considered that the additional/alternative site should be allocated to address these current deficiencies in the plan.

4.0 Requested/Recommended Changes to the Plan

As a result of the above representations, the particular parts/policies of the Plan and which are considered to need amendment are:

- Policy SP11 – Amendment to the level of housing proposed within the Eastern Expansion Area to ensure the spatial distribution of housing provision across the City to reduce over reliance on one area within the eastern part of the City.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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•Policy H1 – In light of the above amendment to the level of proposed housing within the Eastern Expansion Area to reflect reapportionment/redistribution of the provision of dwellings over the City during the plan period, the site at Church Farm should be allocated.

Furthermore, the proposals map of the LDP will need to be amended to include:

- The additional site at Church Farm as a housing allocation.
- Revision of the settlement boundary to include Church Farm within the settlement boundary.

It is, therefore respectfully requested that the plan is amended in accordance with the above requirements to safeguard its soundness.

6.0Conclusion

This statement is submitted as a response to the Deposit Newport Local Development Plan on behalf of my client Mr John Ballinger regarding land at the western side of Newport at Church Farm, Marshfield, which is being promoted as a housing land allocation or extension to the proposed LDP settlement boundary.

In promoting the development of land at Church Farm the following representations:

•Object on the basis that policy SP11 that too much housing is being concentrated within the planned eastern expansion area. This is a too confined area and in this current economic climate does not allow for any flexibility. The plan is therefore not sound.

•Object to policy H1 on the grounds that the representation site is not included as a specific housing allocation. The proposals map should include for a revised settlement boundary and site allocated to reflect reapportionment/redistribution of the provision of dwellings over the City during the plan period.

A Sustainability Appraisal of the site has been included in this representation and on the completed forms, which demonstrate beyond all reasonable doubt that the development could be accommodated without any undue environmental impacts where there are many positive effects.

It is respectfully requested that the Council give very careful consideration to these representations and that the plan is amended accordingly in subsequent focussed changes.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	No
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE2 and CE4	
<i>Item</i>	<i>Question</i>		<i>Tick-box reply</i>
8	8	Add a new site.	Yes
10	10	Delete an existing site.	Yes

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2050.D2//SP11	Ballinger, Mr John	Beaver Building Surveying Ltd		23/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.23

Policy: SP11

Summary: Objection to the over reliance of housing provision in the East of Newport

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Church Farm Marshfield	
12	12	Site Reference 2050	

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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<i>Item Question</i>		<i>Tick-box reply</i>	
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2050.D3//H01	Ballinger, Mr John	Beaver Building Surveying Ltd		23/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.62

Site: 395/ Church Farm

Boundary
Change

Policy: H01

Map: Inset 2: Marshfield and Castleton Village
Boundary

Summary: Change Marshfield village boundary to include site.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Response</i>
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Church Farm, Marshfield	
12	12	Site Reference 2050	

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3.0 Representation on the Plan Strategy and Strategic Policies

One of the strategic objectives of the plan is 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.

Policy H1 identifies that a total of 10,953 units estimated to be delivered within the plan period. However, a total of 5,097 of these new homes, which represents nearly 50% of all new homes are going to be concentrated in one part of the City as set out under policy SP11 (Eastern Expansion Area). We do not consider this is sustainable and will not meet the needs of the population in providing balanced communities. We have serious concerns over the robustness of the plan and that it is fundamentally flawed in concentrating nearly 50% of new homes in one area.

We therefore strongly object to Policy H1 (Housing supply) as the site that forms part of these representations is not included. Indeed no housing allocations are proposed in Marshfield, despite it being a sustainable settlement and strategically located to accommodate housing growth in the western part of Newport.

We also strongly object to Policy SP11 that concentrates a significant proportion of new housing within the eastern area of Newport.

Over the past five years due to poor market conditions we have seen the impact this has had on the provision of new housing. Indeed the signs are that the housing market will remain subdued for the next ten years, which will mirror this plan period. It is, therefore essential to build in flexibility to the strategy and in particular allow for the distribution of housing across including the western side of Newport not just heavily concentrated in one area. We contest that it is necessary to provide for a greater proportion of sites likely to be developed in the short term that includes the site proposed at Church Farm. The addition of this site as a housing allocation (over 10 dwellings) will provide such an opportunity and add to the choice and variety of sites that are considered important to the Welsh Government.

The allocation of this site would therefore provide flexibility required by the test of soundness CE4, given uncertainties in the housing market in the next ten years that mirrors this plan period.

Marshfield is a more sustainable location than the Eastern Expansion Area as it is well placed between two main employment centres, as well as enjoying excellent public transport links to both centres. In light of the existing uncertainty in the housing market, the plan is rigid and there is no degree of flexibility to deal with these challenging economic circumstances. By allocating the site in Marshfield, such provision would improve the soundness of the Plan by allowing for sufficient flexibility, and by ensuring deliverability, the strategy, policies and allocations would be realistic and appropriate, thus satisfying the test of soundness CE2.

In summary, it is considered that the spatial apportionment/distribution of housing growth across the City is fundamentally flawed. The provision of nearly 50% of new housing within the plan period to be concentrated in one area represents an over-reliance on the contribution of one area within the eastern part of the City to deliver new housing over the plan period in challenging economic times. This raises serious concerns over the soundness and robustness of the plan. Accordingly it is considered that the additional/alternative site should be allocated to address these current deficiencies in the plan.

4.0 Requested/Recommended Changes to the Plan

As a result of the above representations, the particular parts/policies of the Plan and which are considered to need amendment are:

- Policy SP11 – Amendment to the level of housing proposed within the Eastern Expansion Area to ensure the spatial distribution of housing provision across the City to reduce over reliance on one area within the eastern part of the City.

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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•Policy H1 – In light of the above amendment to the level of proposed housing within the Eastern Expansion Area to reflect reapportionment/redistribution of the provision of dwellings over the City during the plan period, the site at Church Farm should be allocated.

Furthermore, the proposals map of the LDP will need to be amended to include:

- The additional site at Church Farm as a housing allocation.
- Revision of the settlement boundary to include Church Farm within the settlement boundary.

It is, therefore respectfully requested that the plan is amended in accordance with the above requirements to safeguard its soundness.

6.0 Conclusion

This statement is submitted as a response to the Deposit Newport Local Development Plan on behalf of my client Mr John Ballinger regarding land at the western side of Newport at Church Farm, Marshfield, which is being promoted as a housing land allocation or extension to the proposed LDP settlement boundary.

In promoting the development of land at Church Farm the following representations:

•Object on the basis that policy SP11 that too much housing is being concentrated within the planned eastern expansion area. This is a too confined area and in this current economic climate does not allow for any flexibility. The plan is therefore not sound.

•Object to policy H1 on the grounds that the representation site is not included as a specific housing allocation. The proposals map should include for a revised settlement boundary and site allocated to reflect reapportionment/redistribution of the provision of dwellings over the City during the plan period.

A Sustainability Appraisal of the site has been included in this representation and on the completed forms, which demonstrate beyond all reasonable doubt that the development could be accommodated without any undue environmental impacts where there are many positive effects.

It is respectfully requested that the Council give very careful consideration to these representations and that the plan is amended accordingly in subsequent focussed changes.

15	15	Do you want to speak at Public Examination?	No
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness CE2, CE4	
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Item Question

Tick-box reply

8	8	Add a new site.	Yes
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2053.D1//EM02	Curzon Industrial Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

SA/SEA submitted

Document: Deposit Plan, p.77

Site: 318/ Imperial Park

New Site

Policy: EM02

Map: Proposals Plan - West

Summary: Propose development at Imperial Park

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
4	4	The Proposals Map Proposals Map West	Yes
11	11	Site Name Imperial Park	
12	12	Site Reference 2053.C1	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

New Site Allocation: Land at Imperial Park

This site should be allocated for mixed use - including retail and hotel facilities. These uses can be viewed as ancillary to the surrounding employment allocations.

Please refer to the supporting cover letter for further justification regarding this site.

Savills are instructed by Curzon Industrial Partners Ltd to make representations in respect to the Newport's Deposit Local Development Plan (DLDP).

The representations relate to alternative sites being allocated for non-employment uses within the greater Newport area.

This letter should be read in conjunction with the representation forms, which are enclosed. Representations are made following a brief discussion of the background to the site and its context.

Representation forms are enclosed on the following Polices/Maps:

- Objection to LDP draft proposals map/proposals map West

In addition, I provide the following enclosures:

- Sustainability appraisal for alternative site
- Red line plan identifying the site.

Introduction and context

Imperial Park consists of a range of high quality class B8 and warehousing units. It is located adjacent to Junction 28 of the M4 motorway and is accessed from the A48. The site is located within an area identified for economic growth (UDP Policy ED1) and adjoins the adopted UDP employment allocations at Duffryn (Policy ED1 (i) and Cleppa Park (Policy ED2 (ii)) – largely replicated within policies EM(i) and EM1(iii) of the LDP.

The site, the subject of this Deposit site submission, consists of two of the five units at Imperial Park (Units IP1 & IP2) and the land surrounding it, as identified on the enclosed plan. The park was developed in 1997 as part of the larger LG electronics complex. There are opportunities for expansion and new development on the site.

This representation proposes that the existing units (IP1 & IP2) and the surrounding land should be allocated for retailing (Use Class A1) and/or hotel/conferencing uses.

The current position on the site

The site currently consists of a total floorspace of 12340 sq m. for Class B8 (storage and distribution) use. The units occupy prominent locations fronting the A48 dual carriageway. The site benefits from a number of sustainability credentials – including its accessible location and excellent bus links, brownfield nature and proximity to residential areas.

There have been a considerable number of high quality office developments in this area of Newport over the last 10 – 15 years, and current occupiers in the vicinity include the Welsh Assembly Government, the Home Office and Lloyds TSB. There is accordingly an opportunity therefore to develop ancillary uses in this area – including a hotel / conferencing facilities and / or retail.

Most importantly, if the proposed allocation was successful, over 32,527 sq m. would remain available to let for employment uses on the site, within the ownership of the applicant.

Planning Policy Context

The adopted Newport Unitary Development Plan (UDP) (2006) Proposals Map does not allocate the site for any particular use; it is therefore 'white land' within the settlement boundary. We are aware of

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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the criteria set out in Policy ED3 'Reappraising the Supply of Employment Land' of the UDP against which proposals for alternative uses of employment land will be assessed.

The Deposit Local Development Plan (LDP) (2011-2026) illustrates that there have been no changes to the allocation of the site, and thus remains as 'white land' and within the settlement boundary. The Deposit Plan refers to Policy EM3 Alternative Uses for Employment Land, this includes criteria against which proposals for alternative uses will be assessed against the likely employment level of the alternative proposal, the remaining supply of employment land (particularly resisting the loss of prestigious land which has good access to transport links), and the availability of other land or buildings for the proposed alternative use.

At the recent public inquiry relating to the Monmouthshire Bank Sidings site it was accepted by the Inspector that there is an abundant supply of employment land in Newport, in particular noting it was established that 65 years worth of unconstrained employment land was available.

Given this context, there is significant scope for alternative uses for Imperial Park other than for employment given its prominent position in an area of expansion surrounded by employment allocations at Duffryn and Cleppa Park, as such the site would be able to provide the required ancillary uses to the employees and generate employment through their uses. As such the following objections to the LDP are made.

Objections

Objection forms are included in relation to the proposals map.

Objection to the LDP draft Proposals Map/Proposals Map West

An objection is made in relation to the site not being allocated for any particular use; it is therefore 'white land', as indicated within the Proposals Map West.

The site is situated between employment allocations EM1 (i) and (iii) and thus is ideally located for a mixed use allocation which can form a link between the two employment allocations.

The site has the potential to further provide employment, through a range of alternative uses which would be created through the development of retail and hotel space at the site; these would also provide important ancillary uses to the proposals for Employment at Duffryn and Celtic Springs.

Proposal

Mixed use site allocation

The site is considered to be both sustainable and accessible offering a potential location for a retail (including food) allocation due to its proximity to areas of employment, thus enabling potential linked trips. Indeed, any positive effect of potential linked trips can also be maximized and enhanced by a number of specific measures which can be built into, and form an integral part of any proposal for the site. There is currently a lack of provision of local ancillary and complementary uses for the employees of Imperial Park and the wider employment area including Celtic Springs Business Park.

The area south of Newport (including the residential areas of Tredegar Park, Maesglas and Gaer) is currently poorly served by food retail provision. A retail provision in this location would provide a more accessible and sustainable option for people in this locality.

There is also an opportunity for the provision of a comparison / bulky goods allocation at this location. We are aware that the available expenditure for comparison goods is much greater than for convenience goods. The site is easily accessible from the M4 motorway and benefits from potential retail frontage on to the A48.

The site at Imperial Park also provides an opportunity for a hotel / conferencing facility. Such an allocation would complement the office uses in the surrounding area and allow for them to function efficiently, attract occupiers and maintain and enhance the current commercial appeal of the location and wider area.

An allocation for C1 use (hotel) on the site would be in accordance with existing UDP policy and regeneration objectives to encourage the development of land already available and maximise economic development opportunities in Newport. As such, it is considered that a hotel and conferencing facility at this location would broadly conform with the criteria set out in Policy ED13 'Tourism Development' – the site could be accessed by a range and choice of transportation options and any proposal would be of an appropriate scale and design for its locality.

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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In addition to being suitable for large scale retail uses, the site has the capacity for neighbourhood retail and food and drink uses, which could be accommodated in several locations within the site to serve the large scale employment uses in the area/

Summary

There is a genuine opportunity for the allocation of an alternative use, such as retail & or hotel and conferencing facility at Imperial Park. Such uses would be compatible and supportive of the numerous office developments in the vicinity (Duffryn and Cleppa Park). Accordingly, the improved mix of uses and facilities for employees in the area ought to increase the commercial appeal of the area and act as a catalyst for further investment.

Consequently, an allocation is sought for the mixed use development of the site to include a range of potential uses including retail (large and/or small scale), hotel, conferencing and employment uses.

We would welcome the opportunity to speak at hearings regarding the site, allowing further detail to be discussed.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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Imperial Park is a key site within the western part of the city. Appearing at the hearing will allow the full case to be presented on this important site for mixed uses (retail &/or hotel and conferencing facilities)

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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CE2 - There isnt any robust evidence provided as to why Imperial Park shouldn't be allocated as a mixed use site.

CE4 - Given the plan period extends until 2026, there doesn't seem to be enough flexibility to deal with changing circumstances of Newport as a whole. Imperial Park site allocation would allow for a range of uses to be incorporated during the plan period within an area that is marked for expansion.

Item Question

Tick-box reply

8	8	Add a new site.	Yes
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Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2062.D1//SP07	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.19

Site: 378/ Gelli Bach (Whole Area)

Boundary Change

Policy: SP07

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: To include Candidate Site Gelli Bach, seek the removal of the site from Green Wedge allocation

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number SP7
11	11	Site Name Gelli Bach
12	12	Site Reference 125

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Please see attached correspondence. Option 1 - Whole Site Assessment of the Suitability of the Settlement for Development

The site is located within the current adopted UDP directly adjacent to the settlement limits of Castleton. Accordingly it occupies a position which is within close proximity to the existing settlement. Castleton, and Marshfield, within the Deposit LDP are identified as one of the 15 villages within the Authority.

Castleton has the following services and facilities:

- Police Station
- Church
- Petrol Filling Station and Shop
- Public House
- Hotel

In addition, Marshfield provides the following services and facilities:

2 Public Houses

- Local Shop
- Post Office
- Recreation Ground
- 3 Areas of informal Open Space
- Community Centre

Accordingly, it is considered that collectively both settlements are well provided for in terms of services and facilities – at least in so far as providing and meeting ‘day to day’ needs and services relied upon by residents. The settlements are considered ‘self sufficient’ and ‘sustainable’ in this respect. It is therefore clear that additional residential development would, in principle, be appropriate within the settlement of Castleton.

It is considered that, in addition to being suitable for residential growth, additional housing development would assist in ensuring the continued viability of the existing shops and services within both the settlements, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.

Assessment of the Suitability of Site for Development

In assessing the suitability of the site for development a number of key issues need to be considered in detail. These are as follows:

- Overview of Key Considerations relating to the site
- Assessment of the site as part of the Candidate Sites Process

Overview of Key considerations relating to the site

The proposed site is located adjacent to the settlement of Castleton. In terms of the key characteristics of the site the following points are of relevance:

- The site encompasses an area of rough grassland, comprising of 2 flat fields
- The site is bound (and enclosed) by the following physical / ‘defensible’ boundaries:
 - North: existing dwelling and large factory
 - East: mature boundary of trees and existing mature hedgroves
 - South: existing road and dwellings
 - West: existing dwellings
- Access to the site for vehicles is currently provided directly to the north of the site

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- There is a band of existing trees running horizontally across the site.

It is considered that the site is relatively well-placed (in comparison to many site's within the locality in terms of its credentials for allocation with LDP for residential development, as detailed below:

- The site is located within close proximity to the existing settlements of Castleton and Marshfield (i.e. designated settlements within the UDP and Deposit LDP).
- Located adjacent to the site on Marshfield Road are bus stops providing NW-bound and S-bound services. The site is also located 640 metres south of the Castleton (SW-bound and NE-bound) bus services which provide regular and also direct services to Cardiff and Newport.
- The site is closely related to the existing settlement of Castleton. In light of the site's location on the boundary of the settlement limit, and its enclosure by existing development / highways / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjacent to Castleton (and could be considered and presented as appropriate 'rounding-off' the existing settlement).
- The site is bound on all sides by existing development, highways and mature landscaping – it is therefore enclosed by 'defensible' boundaries to all aspects and cannot be considered to be 'open countryside'.
- The site does not encompass brownfield / previously developed land (i.e. it is a greenfield site). However, in its favour, it is not of high agricultural quality, and has limited existing features which would pose a constraint to development (other than existing hedgerows).

Assessment of the site as part of the Candidate Sites Process

An assessment of the candidate sites was undertaken by Atkins as part of the Sustainability Appraisal / Strategic Environmental Assessment. Within their report, the candidate sites for Castleton appear to be assessed as a whole and the following key conclusions / recommendations were provided:

- Taken together the sites are likely to have a significant effect on the landscape and townscape as they pose a significant increase to the settlement
- PROWS should be retained
- Sites should be surveyed for potential for providing habitats for important species
- The sites could include some employment / mixed use development
- Dedicated walking and cycling routes could be provided

A more detailed response to the candidate site submission was provided by the LPA as part of the overall responses. These suggested that:

- The site is in green wedge and a special landscape area
- The plan is based on a brownfield site strategy
- Potential landscape and visual impacts could arise
- The site is subgrade 3a agricultural land
- The proposed site is located within an area where there is a shortfall of play space- and accordingly a LEAP would need to be provided.

It is considered that in relation to the above conclusions there no significant constraints to the development of this site.

In response to the main issue - effect on landscape / townscape, in order to consider this point more comprehensively, so that a balanced assessment concerning the impact of any residential allocation on the countryside can be arrived at, a landscape assessment was undertaken.

It is noted in the conclusions of the report that although the site is located within a semi-rural context, as a result of the topography of the surrounding landscape to the south and the west – combined with existing hedgerows, trees, in the immediate area, views of the site are predominately screened from the majority of public vantage points. In summary, as the site is adjacent to existing housing, its development for residential purposes would be neither prominent nor isolated and could compliment the semi-rural character of Castleton.

In terms of each of the 2 Options, an indicative landscape / development strategy is provided in the report. An overview of these is provided below Option 1 Whole Site

- Concentrating housing to the northern land parcel ensures the houses are extremely well screened due to existing hedgerows and mature trees with a transition from higher density in the

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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north to lower density / open space in the south.

- The retention of the majority existing mature trees which 'split' the fields, and are located to the east of the site, along with the retention of the existing hedgerow to the north and the proposed new planting to the south east will maintain and enhance / preserve the existing character of the surrounding landscape and provide an appropriate interface with the rural landscape beyond.
- Proposed public open space to the south west of the site and a sensitive housing density in the southern field parcel ensures a gradual transition between built form to maintain the existing character of Bakery Lane and the surrounding area.

Option 2 – Northern Field

- Development in the northern field ensures the houses are extremely well screened due to existing hedgerows and mature trees. This will ensure that there is no visual harm on the adjacent landscape / countryside.

Assessment of Green Wedge / Special Landscape Designation

The purpose of the green wedge and special landscape area is to prevent urban coalescence— however the 'open' nature of the green wedge would not be significantly altered by the development of this site. Although the site is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

In addition, the site is not afforded any further policy protection for nature conservation interests etc, over and above the green wedge and special landscape designations. As such, in light of the above, it is considered that the potential harm caused to the green wedge by the development of the site would potentially be minimal, and would potentially be outweighed by other considerations.

In summary an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the countryside. In particular, existing mature planting / hedgerows which surround the site, could be maintained and / or supplemented to ensure a sensitive scheme, which maintains the village's setting within the rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed.

Summary of the Suitability of Site for Development

As outlined above the proposed site at Gelli Bach represents a site which is considered to be suitable for residential development.

In summary therefore, the site is considered to be suitable for residential development for the following reasons: Economic Viability

- There are no economic constraints which will affect the development of the site within the plan period.
- The landowners are in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of the land.
- The site is able to served to by existing utilities infrastructure.

Highways

- Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.

Sustainability

- The site is located within close proximity of bus stops.

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- The site is accessible to local destinations on foot.
- The settlements of Castleton and Marshfield provide a range of services / facilities.
- The development of additional residential units will further sustain the existing services within the settlements.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that the development proposal will not have any negative impact on the surrounding countryside.
- Any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the site from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the site from the special landscape area.
- Policy SP10 Residential Requirement – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher 'contingency' for flexibility over the Plan period.
- Policy H1 Housing Supply – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.

In addition, the Proposals Map of the LDP needs to be amended to include:

- The Alternative Site as a housing allocation (and within settlement limits) Removal of the site from the green wedge designation
- Removal of site from special landscape designation

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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To relay the findings of detailed work undertaken and to put forward the issues contained within these representations

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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C2, CE1, CE2, CE3, CE4

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2062.D2//SP08	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.20

Site: 379/ Gelli Bach (Whole Area)

Boundary Change

Policy: SP08

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: To include Candidate Site Gelli Bach, seek the removal of the site from Special Landscape Area designation

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number SP8
11	11	Site Name Gelli Bach
12	12	Site Reference 125

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Please see attached correspondence. Option 1 - Whole Site Assessment of the Suitability of the Settlement for Development

The site is located within the current adopted UDP directly adjacent to the settlement limits of Castleton. Accordingly it occupies a position which is within close proximity to the existing settlement. Castleton, and Marshfield, within the Deposit LDP are identified as one of the 15 villages within the Authority.

Castleton has the following services and facilities:

- Police Station
- Church
- Petrol Filling Station and Shop
- Public House
- Hotel

In addition, Marshfield provides the following services and facilities:

2 Public Houses

- Local Shop
- Post Office
- Recreation Ground
- 3 Areas of informal Open Space
- Community Centre

Accordingly, it is considered that collectively both settlements are well provided for in terms of services and facilities – at least in so far as providing and meeting ‘day to day’ needs and services relied upon by residents. The settlements are considered ‘self sufficient’ and ‘sustainable’ in this respect. It is therefore clear that additional residential development would, in principle, be appropriate within the settlement of Castleton.

It is considered that, in addition to being suitable for residential growth, additional housing development would assist in ensuring the continued viability of the existing shops and services within both the settlements, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.

Assessment of the Suitability of Site for Development

In assessing the suitability of the site for development a number of key issues need to be considered in detail. These are as follows:

- Overview of Key Considerations relating to the site
- Assessment of the site as part of the Candidate Sites Process

Overview of Key considerations relating to the site

The proposed site is located adjacent to the settlement of Castleton. In terms of the key characteristics of the site the following points are of relevance:

- The site encompasses an area of rough grassland, comprising of 2 flat fields
- The site is bound (and enclosed) by the following physical / ‘defensible’ boundaries:
 - North: existing dwelling and large factory
 - East: mature boundary of trees and existing mature hedgroves
 - South: existing road and dwellings
 - West: existing dwellings
- Access to the site for vehicles is currently provided directly to the north of the site

Representation Details

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- There is a band of existing trees running horizontally across the site.

It is considered that the site is relatively well-placed (in comparison to many site's within the locality in terms of its credentials for allocation with LDP for residential development, as detailed below:

- The site is located within close proximity to the existing settlements of Castleton and Marshfield (i.e. designated settlements within the UDP and Deposit LDP).
- Located adjacent to the site on Marshfield Road are bus stops providing NW-bound and S-bound services. The site is also located 640 metres south of the Castleton (SW-bound and NE-bound) bus services which provide regular and also direct services to Cardiff and Newport.
- The site is closely related to the existing settlement of Castleton. In light of the site's location on the boundary of the settlement limit, and its enclosure by existing development / highways / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjacent to Castleton (and could be considered and presented as appropriate 'rounding-off' the existing settlement).
- The site is bound on all sides by existing development, highways and mature landscaping – it is therefore enclosed by 'defensible' boundaries to all aspects and cannot be considered to be 'open countryside'.
- The site does not encompass brownfield / previously developed land (i.e. it is a greenfield site). However, in its favour, it is not of high agricultural quality, and has limited existing features which would pose a constraint to development (other than existing hedgerows).

Assessment of the site as part of the Candidate Sites Process

An assessment of the candidate sites was undertaken by Atkins as part of the Sustainability Appraisal / Strategic Environmental Assessment. Within their report, the candidate sites for Castleton appear to be assessed as a whole and the following key conclusions / recommendations were provided:

- Taken together the sites are likely to have a significant effect on the landscape and townscape as they pose a significant increase to the settlement
- PROWS should be retained
- Sites should be surveyed for potential for providing habitats for important species
- The sites could include some employment / mixed use development
- Dedicated walking and cycling routes could be provided

A more detailed response to the candidate site submission was provided by the LPA as part of the overall responses. These suggested that:

- The site is in green wedge and a special landscape area
- The plan is based on a brownfield site strategy
- Potential landscape and visual impacts could arise
- The site is subgrade 3a agricultural land
- The proposed site is located within an area where there is a shortfall of play space- and accordingly a LEAP would need to be provided.

It is considered that in relation to the above conclusions there no significant constraints to the development of this site.

In response to the main issue - effect on landscape / townscape, in order to consider this point more comprehensively, so that a balanced assessment concerning the impact of any residential allocation on the countryside can be arrived at, a landscape assessment was undertaken.

It is noted in the conclusions of the report that although the site is located within a semi-rural context, as a result of the topography of the surrounding landscape to the south and the west – combined with existing hedgerows, trees, in the immediate area, views of the site are predominately screened from the majority of public vantage points. In summary, as the site is adjacent to existing housing, its development for residential purposes would be neither prominent nor isolated and could compliment the semi-rural character of Castleton.

In terms of each of the 2 Options, an indicative landscape / development strategy is provided in the report. An overview of these is provided below Option 1 Whole Site

- Concentrating housing to the northern land parcel ensures the houses are extremely well screened due to existing hedgerows and mature trees with a transition from higher density in the

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north to lower density / open space in the south.

- The retention of the majority existing mature trees which 'split' the fields, and are located to the east of the site, along with the retention of the existing hedgerow to the north and the proposed new planting to the south east will maintain and enhance / preserve the existing character of the surrounding landscape and provide an appropriate interface with the rural landscape beyond.
- Proposed public open space to the south west of the site and a sensitive housing density in the southern field parcel ensures a gradual transition between built form to maintain the existing character of Bakery Lane and the surrounding area.

Option 2 – Northern Field

- Development in the northern field ensures the houses are extremely well screened due to existing hedgerows and mature trees. This will ensure that there is no visual harm on the adjacent landscape / countryside.

Assessment of Green Wedge / Special Landscape Designation

The purpose of the green wedge and special landscape area is to prevent urban coalescence— however the 'open' nature of the green wedge would not be significantly altered by the development of this site. Although the site is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

In addition, the site is not afforded any further policy protection for nature conservation interests etc, over and above the green wedge and special landscape designations. As such, in light of the above, it is considered that the potential harm caused to the green wedge by the development of the site would potentially be minimal, and would potentially be outweighed by other considerations.

In summary an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the countryside. In particular, existing mature planting / hedgerows which surround the site, could be maintained and / or supplemented to ensure a sensitive scheme, which maintains the village's setting within the rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed.

Summary of the Suitability of Site for Development

As outlined above the proposed site at Gelli Bach represents a site which is considered to be suitable for residential development.

In summary therefore, the site is considered to be suitable for residential development for the following reasons: Economic Viability

- There are no economic constraints which will affect the development of the site within the plan period.
- The landowners are in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of the land.
- The site is able to served to by existing utilities infrastructure.

Highways

- Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.

Sustainability

- The site is located within close proximity of bus stops.

Representation Details

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- The site is accessible to local destinations on foot.
- The settlements of Castleton and Marshfield provide a range of services / facilities.
- The development of additional residential units will further sustain the existing services within the settlements.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that the development proposal will not have any negative impact on the surrounding countryside.
- Any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the site from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the site from the special landscape area.
- Policy SP10 Residential Requirement – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher 'contingency' for flexibility over the Plan period.
- Policy H1 Housing Supply – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.

In addition, the Proposals Map of the LDP needs to be amended to include:

- The Alternative Site as a housing allocation (and within settlement limits) Removal of the site from the green wedge designation
- Removal of site from special landscape designation

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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To relay the findings of detailed work undertaken and to put forward the issues contained within these representations

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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C2, CE1, CE2, CE3, CE4

Representation Details

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2062.D3//SP10	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Site:

Policy: SP10

Map: Inset 2: Marshfield and Castleton Village
Boundary

Summary: To include Candidate Site Gelli Bach, seek to increase the flexibility of housing supply through appropriate greenfield sites

Item Question Representation Text

2 2 Policy Number
SP10

11 11 Site Name
Gelli Bach

12 12 Site Reference
125

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14 14 Representation

Please see attached correspondence. Option 1 - Whole Site Preface

This Annex sets out the detailed case in support of these representations.

It provides both a critique of the current provisions of the plan, and suggested changes to its content.

The representations are structured as follows:

- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
- An Assessment of the Suitability of Site for Development;
- A Summary of the Suitability of Site for Development;
- Requested / recommended changes to the Plan.

Summary of Overall Position

An overview / summary of the position taken and evidence put forward by these representations is provided below:

- It is considered that the Plan's overall supply for housing underprovides as opposed to overprovides – particularly as it is considered that the LDP's proposed brownfield strategy will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan.
 - The plan overestimating the speed in which development can be brought forward on a number of brownfield sites, and does not allow for a range and choice of sites to come forward as and when they are required. Accordingly, it is our view that the proposed primarily brownfield strategy should be amended to include a number of appropriate greenfield sites that are able to come forward in a timely manner in response to market demands.
 - An additional 'contingency' of housing land supply should therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period – which further makes the case for the need for additional housing allocations particularly on greenfield sites which are likely to be deliverable within the early periods of the plan.
 - Residential development is in principle appropriate within Castleton, as the settlement has been assessed as being well provided for in terms of services and facilities..
 - The proposed site on at Gelli Bach is considered to be a suitable site for residential development, particularly in view of the following factors:
 - o There are no economic constraints which will affect the development of the site within the plan period.
 - o The landowner is in agreement with the proposed land use of the site.
 - o Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
 - o The site is located within close proximity of frequent public transport services.
 - o The site is accessible to local destinations on foot.
 - o Castleton and Marshfield provide a range of services, amenity facilities, shops and services.
 - o The development of additional residential units will further sustain the existing services within Castleton and Marshfield.
 - o The site is not subject to any ecological designations.
- The site's location provides an opportunity for residential development which would be neither prominent nor isolated.
- o Existing mature planting / hedgerows, could be maintained and / or supplemented.
 - o The site is at no risk of flooding.

Consideration of Housing Supply by the Plan

Overall / Plan-Wide Housing Land Supply

Housing Requirement / Strategy

Policy SP10 of the Deposit LDP indicates that over the plan period (2011-2026) sufficient land will be made available to provide for 8,750 dwellings. It is stated that the land to meet this requirement will

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be primarily previously developed / brownfield land. It is noted in paragraph 2.38 that the supply of housing land in the plan includes many sites that were identified in the previously adopted UDP – and because of their size, many of them have substantial parts which are not yet started.

Within Section 5 – Housing, it is noted that in terms of existing commitments, including sites subject to S106 agreements and site under construction, there appears to be a potential over provision in the number of plots to meet the identified dwelling requirement over the plan period.

Notwithstanding this, it is considered that there is a fundamental issue in terms of the deliverability of the housing strategy as a result of the focus on brownfield sites. Brownfield sites, as previously developed sites are likely to have greater site constraints with the potential need for site remediation works etc. Accordingly, brownfield sites can often have higher development costs and take longer to develop. Given the present economic climate there is a need for readily developable and economically viable sites to be identified.

Conversely, greenfield sites, which by their nature are likely to be less constrained, and therefore quicker to be brought forward for development within the early stages of the plan period, would balance out the likely delays in bringing forward development on the brownfield sites.

Despite the overprovision in plots which appears to exist it is considered that a primarily brownfield strategy will not allow the level of annual completions to be met in order to meet the housing need that has been defined.

Deliverability Issues with Primarily Brownfield Only Strategy

Table 5 within the Housing Background paper (April 2012) provides a detailed analysis of the relative number of completions between brownfield and greenfield sites in the last 5 years.

Period	Total Completions	Total Greenfield Completions	Total Brownfield Completions	% of Brownfield completions as overall housing supply
2006/7	462	169	293	63
2007/8	571	157	414	73
2008/9	582	87	495	85
2009/10	362	17	345	95
2010/11	361	0	361	100

This demonstrates that generally housing completions have been falling on an annual basis. Whilst this is in part due to economic issues, it is considered that is a result of a lack of greenfield completions contributing to the overall figure as they have been falling on an annual basis – and in 2010/11 there was not 1 completion on a greenfield site.

It is noted that the UDP provided for the phasing of the allocated housing sites over three successive five year periods – 1996 to 2001, 2001 - 2006 and 2006 to 2011 (the UDP was also based on a strategy of primarily brownfield only sites). The table below provides an overview of the completions during each period against the target UDP requirement:

Period	Average UDP requirement	Total Completions	Residual Requirements
1996 - 2001	1800	2184	+384
2001 - 2006	2000	2212	+212
2006 - 2011	3700	2558	-1142

It is considered that the above table demonstrates that, although completions have actually increased over each of the 5 year periods, that due to the small number of greenfield site having been built out (as evidenced in Housing Background Paper) as a result of the brownfield strategy this has resulted in the shortfall of housing completions which currently exists. This drop in completions over the last remaining years of the UDP is further evidence by the fact that in 2009 – 2011 on average there have been less than 400 completions per annum.

It is considered that all of the allocated housing sites are highly unlikely to come forward exactly as the phasing plan provides for, and that some sites timetabled for release early in the LDP period will be delayed.

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In order to further demonstrate the over reliance upon brownfield sites, the following table provides an overview of the key strategic brownfield sites which were 'allocated' within the UDP and are now proposed to be included within the LDP – and the estimated units which will be delivered within the respective plan period.

UDP allocation / Units / LDP allocation / Units
H1(5) Glebelands /153 / H5 Glebelands / 153
H1(4) Adj Bus Depot & Newport Athletic /160 / H18 Newport Athletic Club / 200
Club
H1(14) & H1(45) Crindau /420 / H55 Crindau / 420
H1(54) Eastern Expansion Area /1100 / H3 Eastern Expansion Area / 1100
H1(44) Monmouthshire Bank Sidings /450/ H14 Monmouthshire Bank Sidings / 545
H1(50) Whitehead Works /400/ H51 Whitehead Works /400
H1(51) Pirelli Works / 150 / H4 Pirelli / 200
H1(53) Llanwern / 600 / H47 Glan Llyn / 2997

In addition to this it is estimated that 495 units will come forward on the Lysaghts Village (Orb Works) over the LDP plan period.

The above table demonstrates that there are a significant number of units on current allocated brownfield sites which have not come forward over the UDP period (with the majority of these not having seen any development at all). The proposed 'rolling forward' of these allocations is not fundamentally contested, however should the majority of these key sites (allocated to meet the housing requirement) not come forward early within the LDP plan period the housing requirement will not be met. This issue is further evidence in the most recent Joint Housing Land Availability Study (2010). This confirms that of a number of the brownfield site listed above a significant proportion of the units fall within category 3 (sites where development is unlikely within the next 5 years due to major physical constraints).

Site /Units to be completed by 2015 /Category 3 units
Glan Llyn /575 / 3425
Pirelli Works /150 / 50
Eastern Expansion Area /150 /950
Cindau /50 / 370
Monmouthshire Bank Sidings / 200 / 250

Of the sites that have been listed it is also questionable whether the number of units specified to be delivered by 2015 will come forward.

In the case of Glan Llyn, following the approval of the recent reserved matters application for 301 units in 2011, it is not considered that 575 units can be delivered by 2015. Not only have less than the 575 units been granted planning permission to date as part of the first phase of the scheme, but this would require in the region of 143 units to be completed per annum over the next 4 years. This is considered an extremely unlikely rate of house building for a single site, particularly in the current housing market when sales could be slow.

Accordingly, it is considered likely that the Authority will be "behind" in providing the required housing numbers before the end of the first phase of the LDP (in 2016).

In view of this, it is considered that the LDP's proposed brownfield strategy will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan. In particular, should only one or two housing sites be delayed in coming forward within the first 5 year periods of the Plan (i.e. 2011 – 2016) then the Authority will already fall behind in providing sufficient housing to provide for assessed needs.

This is considered to be particularly likely due to the Council's reliance on / priority given to brownfield sites. Brownfield sites, in their nature, are likely to have more remediation and infrastructure needs resulting in higher development costs and greater potential for development delays. It is therefore considered likely that a number of the brownfield sites proposed for development, will not come forward during this time and / or will provide for lower numbers of units than is currently provided for. Accordingly it is considered that there is requirement to allocate a number of greenfield sites as part of the LDP in order to allow a more equitable and suitable approach in meeting the housing requirement over the plan period.

Infill Issue

Representation Details

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It is noted that in the region of 15% of the Newport's total dwelling supply over the plan period is comprised of potential development from windfall sites (525 units from small windfall sites less than 10 dwellings and 750 units from large windfall sites more than 10 dwellings), which relates to approx 85 dwellings per annum. It is not considered sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites. In 2009/10 the total number of dwellings that came forward through small sites was 33 units and in 2010/11, 40 units came forward - as confirmed within the Housing Background Paper (April 2012). Whilst it is noted that average levels (in the context of the LDP) of windfall development have historically been seen in Newport, it is not considered that this is a trend that is able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller 'pool' of potential windfall sites being available. Therefore, as the levels of potential windfall sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.

Furthermore in relation to small sites, the total number of completions in the last five years as a % of the overall number of completions has average 8.6%. On this basis alone the windfall allowance for small sites over the plan period would need to be in the region of 750 units – some 225 higher than accounted for within the LDP.

Accordingly, based on these more recent trends, it is not considered that the housing provision on small windfall sites will be developed at anywhere near the level of 35 dwellings per annum anticipated and proposed, or 50 dwellings per annum on sites of 10 or more.

It is therefore considered that the LDP overestimates the levels of dwellings expected to come forward on windfall sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly this further establishes the need for the allocation of additional sites for residential development.

Summary

To summarise, it is our view that the Plan's overall supply for housing underprovides as opposed to overprovides – an approach which is inconsistent with the drive to re-stimulate the housing market as a result – due to legitimate concerns about the ability of a number of allocated brownfield sites (which are likely to have greater site constraints) to deliver the required / allocated numbers of units (particularly in the early phases of the Plan period), which further makes the case for the need for additional housing allocations - particularly on greenfield sites which are likely to be deliverable within the earlier periods of the LDP.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
To relay the findings of detailed work undertaken and to put forward the issues contained within these representations			

Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
C2, CE1, CE2, CE3, CE4			

Representation Details

by: Representation No

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2062.D4//H01	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	

Additional material submitted

Document: Deposit Plan, p.62

Site: 319/ Gelli Bach

New Site

Policy: H01

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: To include Candidate Site Gelli Bach, increase housing provision and seek allocation of proposed site

Item Question Representation Text

2 2 Policy Number
H1

11 11 Site Name
Gelli Bach

12 12 Site Reference
125

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Please see attached correspondence. Option 1 - Whole Site

Please find enclosed, on behalf of and under instruction from Mr Mark Williams, representations to the Deposit LDP.

This submission:

- puts forward two Alternative Site Representations; and
- objects to selected policy provisions of the plan.

For each Alternative Site Representation, the following information is (as required) enclosed:

- completed, signed and dated Deposit Plan Response Forms;
- a Landscape Assessment;
- Red line plan.

The two Alternative Site Representations are referred to as follows:

- Option 1 Whole Site;
- Option 2 Northern Field.

The Alternative Site (Option 1) was previously submitted for consideration as part of the candidate sites process of the emerging LDP (site ref: 125). We would also like to confirm that we are now acting for Mr Williams in relation to the LDP process and could you please update your records accordingly.

Although two options for the development of the site are put forward as part of these representations, we consider that Option 1 – Whole Site represents the most suitable and acceptable development scheme for the site – particularly in view of securing viability for the scheme as a whole, and the need to provide readily available sites that are appropriate for residential development to cater for the housing requirements of the plan. Option 1 is therefore the preferred option. However and notwithstanding this, in order to provide a degree of flexibility (and without prejudice to our considered position on the merits of the preferred option), the other development option put forward allows for the development potential of the site to be fully and adequately assessed.

Furthermore, and as an Annex to this letter, a detailed case (providing a critique of the current provisions of the plan and suggested changes to its content) is included, in support of, and to make the case for the inclusion of the Alternative Sites; and suggested changes to the provisions of the Plan's policies.

The Annex addresses the following issues, and is structured accordingly:

- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
- An Assessment of the Suitability of Site for Development;
- A Summary of the Suitability of Sites for Development;
- Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to allocate the sites put forward.

Assessment of the Suitability of the Settlement for Development

The site is located within the current adopted UDP directly adjacent to the settlement limits of Castleton. Accordingly it occupies a position which is within close proximity to the existing

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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settlement. Castleton, and Marshfield, within the Deposit LDP are identified as one of the 15 villages within the Authority.

Castleton has the following services and facilities:

- Police Station
- Church
- Petrol Filling Station and Shop
- Public House
- Hotel

In addition, Marshfield provides the following services and facilities:

2 Public Houses

- Local Shop
- Post Office
- Recreation Ground
- 3 Areas of informal Open Space
- Community Centre

Accordingly, it is considered that collectively both settlements are well provided for in terms of services and facilities – at least in so far as providing and meeting 'day to day' needs and services relied upon by residents. The settlements are considered 'self sufficient' and 'sustainable' in this respect. It is therefore clear that additional residential development would, in principle, be appropriate within the settlement of Castleton.

It is considered that, in addition to being suitable for residential growth, additional housing development would assist in ensuring the continued viability of the existing shops and services within both the settlements, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.

Assessment of the Suitability of Site for Development

In assessing the suitability of the site for development a number of key issues need to be considered in detail. These are as follows:

- Overview of Key Considerations relating to the site
- Assessment of the site as part of the Candidate Sites Process

Overview of Key considerations relating to the site

The proposed site is located adjacent to the settlement of Castleton. In terms of the key characteristics of the site the following points are of relevance:

- The site encompasses an area of rough grassland, comprising of 2 flat fields
- The site is bound (and enclosed) by the following physical / 'defensible' boundaries:
 - North: existing dwelling and large factory
 - East: mature boundary of trees and existing mature hedgerows
 - South: existing road and dwellings
 - West: existing dwellings
- Access to the site for vehicles is currently provided directly to the north of the site
- There is a band of existing trees running horizontally across the site.

It is considered that the site is relatively well-placed (in comparison to many site's within the locality in terms of its credentials for allocation with LDP for residential development, as detailed below:

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- The site is located within close proximity to the existing settlements of Castleton and Marshfield (i.e. designated settlements within the UDP and Deposit LDP).
- Located adjacent to the site on Marshfield Road are bus stops providing NW-bound and S-bound services. The site is also located 640 metres south of the Castleton (SW-bound and NE-bound) bus services which provide regular and also direct services to Cardiff and Newport.
- The site is closely related to the existing settlement of Castleton. In light of the site's location on the boundary of the settlement limit, and its enclosure by existing development / highways / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjacent to Castleton (and could be considered and presented as appropriate 'rounding-off' the existing settlement).
- The site is bound on all sides by existing development, highways and mature landscaping – it is therefore enclosed by 'defensible' boundaries to all aspects and cannot be considered to be 'open countryside'.
- The site does not encompass brownfield / previously developed land (i.e. it is a greenfield site). However, in its favour, it is not of high agricultural quality, and has limited existing features which would pose a constraint to development (other than existing hedgerows).

Assessment of the site as part of the Candidate Sites Process

An assessment of the candidate sites was undertaken by Atkins as part of the Sustainability Appraisal / Strategic Environmental Assessment. Within their report, the candidate sites for Castleton appear to be assessed as a whole and the following key conclusions / recommendations were provided:

- Taken together the sites are likely to have a significant effect on the landscape and townscape as they pose a significant increase to the settlement
- PROWS should be retained
- Sites should be surveyed for potential for providing habitats for important species
- The sites could include some employment / mixed use development
- Dedicated walking and cycling routes could be provided

A more detailed response to the candidate site submission was provided by the LPA as part of the overall responses. These suggested that:

- The site is in green wedge and a special landscape area
- The plan is based on a brownfield site strategy
- Potential landscape and visual impacts could arise
- The site is subgrade 3a agricultural land
- The proposed site is located within an area where there is a shortfall of play space- and accordingly a LEAP would need to be provided.

It is considered that in relation to the above conclusions there are no significant constraints to the development of this site.

In response to the main issue - effect on landscape / townscape, in order to consider this point more comprehensively, so that a balanced assessment concerning the impact of any residential allocation on the countryside can be arrived at, a landscape assessment was undertaken.

It is noted in the conclusions of the report that although the site is located within a semi-rural context, as a result of the topography of the surrounding landscape to the south and the west – combined with existing hedgerows, trees, in the immediate area, views of the site are predominately screened from the majority of public vantage points. In summary, as the site is adjacent to existing housing, its development for residential purposes would be neither prominent nor isolated and could compliment the semi-rural character of Castleton.

In terms of each of the 2 Options, an indicative landscape / development strategy is provided in the report. An overview of these is provided below Option 1 Whole Site

- Concentrating housing to the northern land parcel ensures the houses are extremely well screened due to existing hedgerows and mature trees with a transition from higher density in the north to lower density / open space in the south.
- The retention of the majority existing mature trees which 'split' the fields, and are located to the east of the site, along with the retention of the existing hedgerow to the north and the proposed new planting to the south east will maintain and enhance / preserve the existing character of the surrounding landscape and provide an appropriate interface with the rural landscape beyond.

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- Proposed public open space to the south west of the site and a sensitive housing density in the southern field parcel ensures a gradual transition between built form to maintain the existing character of Bakery Lane and the surrounding area.

Option 2 – Northern Field

- Development in the northern field ensures the houses are extremely well screened due to existing hedgerows and mature trees. This will ensure that there is no visual harm on the adjacent landscape / countryside.

Assessment of Green Wedge / Special Landscape Designation

The purpose of the green wedge and special landscape area is to prevent urban coalescence— however the 'open' nature of the green wedge would not be significantly altered by the development of this site. Although the site is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

In addition, the site is not afforded any further policy protection for nature conservation interests etc, over and above the green wedge and special landscape designations. As such, in light of the above, it is considered that the potential harm caused to the green wedge by the development of the site would potentially be minimal, and would potentially be outweighed by other considerations.

In summary an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the countryside. In particular, existing mature planting / hedgerows which surround the site, could be maintained and / or supplemented to ensure a sensitive scheme, which maintains the village's setting within the rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed.

Summary of the Suitability of Site for Development

As outlined above the proposed site at Gelli Bach represents a site which is considered to be suitable for residential development.

In summary therefore, the site is considered to be suitable for residential development for the following reasons: Economic Viability

- There are no economic constraints which will affect the development of the site within the plan period.
- The landowners are in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of the land.
- The site is able to served to by existing utilities infrastructure.

Highways

- Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.

Sustainability

- The site is located within close proximity of bus stops.
- The site is accessible to local destinations on foot.
- The settlements of Castelton and Marshfield provide a range of services / facilities.
- The development of additional residential units will further sustain the existing services within the settlements.

Environmental Health / Amenity

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- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that the development proposal will not have any negative impact on the surrounding countryside.
- Any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the site from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the site from the special landscape area.
- Policy SP10 Residential Requirement – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher 'contingency' for flexibility over the Plan period.
- Policy H1 Housing Supply – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.

In addition, the Proposals Map of the LDP needs to be amended to include:

- The Alternative Site as a housing allocation (and within settlement limits) Removal of the site from the green wedge designation
- Removal of site from special landscape designation

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination To relay the findings of detailed work undertaken and to put forward the issues contained within these representations	
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Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C2, CE1, CE2, CE3, CE4	
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<i>Item Question</i>	<i>Tick-box reply</i>
8 8 Add a new site.	Yes

Representation Details

by: Representation No

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2062.D5//SP07	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.19

Site: 380/ Gelli Bach (North Field)

Boundary
Change

Policy: SP07

Map: Inset 2: Marshfield and Castleton Village
Boundary

Summary: To Include a smaller site at Gelli Bach, and remove the site from green wedge allocation

Item Question *Representation Text*

2 2 Policy Number
SP7

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

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Representation Details

Newport City Council Local Development Plan

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Environmental Health / Amenity

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Biodiversity / Landscape

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C2, CE4			

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2062.D6//SP08	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.20		Site: 381/ Gelli Bach (North Field)		Boundary Change						
Policy: SP08		Map: Inset 2: Marshfield and Castleton Village Boundary								
Summary: To include a smaller site at Gelli Bach, removal of site from Special Landscape Area										

Item Question Representation Text

2 2 Policy Number
SP8

Representation Details

by: Representation No

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by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- There is a band of existing trees running horizontally across the site.

It is considered that the site is relatively well-placed (in comparison to many site's within the locality in terms of its credentials for allocation with LDP for residential development, as detailed below:

- The site is located within close proximity to the existing settlements of Castleton and Marshfield (i.e. designated settlements within the UDP and Deposit LDP).
- Located adjacent to the site on Marshfield Road are bus stops providing NW-bound and S-bound services. The site is also located 640 metres south of the Castleton (SW-bound and NE-bound) bus services which provide regular and also direct services to Cardiff and Newport.
- The site is closely related to the existing settlement of Castleton. In light of the site's location on the boundary of the settlement limit, and its enclosure by existing development / highways / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjacent to Castleton (and could be considered and presented as appropriate 'rounding-off' the existing settlement).
- The site is bound on all sides by existing development, highways and mature landscaping – it is therefore enclosed by 'defensible' boundaries to all aspects and cannot be considered to be 'open countryside'.
- The site does not encompass brownfield / previously developed land (i.e. it is a greenfield site). However, in its favour, it is not of high agricultural quality, and has limited existing features which would pose a constraint to development (other than existing hedgerows).

Assessment of the site as part of the Candidate Sites Process

An assessment of the candidate sites was undertaken by Atkins as part of the Sustainability Appraisal / Strategic Environmental Assessment. Within their report, the candidate sites for Castleton appear to be assessed as a whole and the following key conclusions / recommendations were provided:

- Taken together the sites are likely to have a significant effect on the landscape and townscape as they pose a significant increase to the settlement
- PROWS should be retained
- Sites should be surveyed for potential for providing habitats for important species
- The sites could include some employment / mixed use development
- Dedicated walking and cycling routes could be provided

A more detailed response to the candidate site submission was provided by the LPA as part of the overall responses. These suggested that:

- The site is in green wedge and a special landscape area
- The plan is based on a brownfield site strategy
- Potential landscape and visual impacts could arise
- The site is subgrade 3a agricultural land
- The proposed site is located within an area where there is a shortfall of play space- and accordingly a LEAP would need to be provided.

It is considered that in relation to the above conclusions there no significant constraints to the development of this site.

In response to the main issue - effect on landscape / townscape, in order to consider this point more comprehensively, so that a balanced assessment concerning the impact of any residential allocation on the countryside can be arrived at, a landscape assessment was undertaken.

It is noted in the conclusions of the report that although the site is located within a semi-rural context, as a result of the topography of the surrounding landscape to the south and the west – combined with existing hedgerows, trees, in the immediate area, views of the site are predominately screened from the majority of public vantage points. In summary, as the site is adjacent to existing housing, its development for residential purposes would be neither prominent nor isolated and could compliment the semi-rural character of Castleton.

In terms of each of the 2 Options, an indicative landscape / development strategy is provided in the report. An overview of these is provided below Option 1 Whole Site

- Concentrating housing to the northern land parcel ensures the houses are extremely well screened due to existing hedgerows and mature trees with a transition from higher density in the

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north to lower density / open space in the south.

- The retention of the majority existing mature trees which 'split' the fields, and are located to the east of the site, along with the retention of the existing hedgerow to the north and the proposed new planting to the south east will maintain and enhance / preserve the existing character of the surrounding landscape and provide an appropriate interface with the rural landscape beyond.
- Proposed public open space to the south west of the site and a sensitive housing density in the southern field parcel ensures a gradual transition between built form to maintain the existing character of Bakery Lane and the surrounding area.

Option 2 – Northern Field

- Development in the northern field ensures the houses are extremely well screened due to existing hedgerows and mature trees. This will ensure that there is no visual harm on the adjacent landscape / countryside.

Assessment of Green Wedge / Special Landscape Designation

The purpose of the green wedge and special landscape area is to prevent urban coalescence— however the 'open' nature of the green wedge would not be significantly altered by the development of this site. Although the site is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

In addition, the site is not afforded any further policy protection for nature conservation interests etc, over and above the green wedge and special landscape designations. As such, in light of the above, it is considered that the potential harm caused to the green wedge by the development of the site would potentially be minimal, and would potentially be outweighed by other considerations.

In summary an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the countryside. In particular, existing mature planting / hedgerows which surround the site, could be maintained and / or supplemented to ensure a sensitive scheme, which maintains the village's setting within the rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed.

Summary of the Suitability of Site for Development

As outlined above the proposed site at Gelli Bach represents a site which is considered to be suitable for residential development.

In summary therefore, the site is considered to be suitable for residential development for the following reasons: Economic Viability

- There are no economic constraints which will affect the development of the site within the plan period.
- The landowners are in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of the land.
- The site is able to served to by existing utilities infrastructure.

Highways

- Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.

Sustainability

- The site is located within close proximity of bus stops.

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- The site is accessible to local destinations on foot.
- The settlements of Castleton and Marshfield provide a range of services / facilities.
- The development of additional residential units will further sustain the existing services within the settlements.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Biodiversity / Landscape

- It is considered that the development proposal will not have any negative impact on the surrounding countryside.
- Any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the site from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the site from the special landscape area.
- Policy SP10 Residential Requirement – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher 'contingency' for flexibility over the Plan period.
- Policy H1 Housing Supply – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.

In addition, the Proposals Map of the LDP needs to be amended to include:

- The Alternative Site as a housing allocation (and within settlement limits) Removal of the site from the green wedge designation
- Removal of site from special landscape designation

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination	
To relay the findings of detailed work undertaken and to putforward the issues contained within these representations.			
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness	
C2, CE4			

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2062.D7//SP10	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Site: 125/2062.C1 Gelli Bach

Policy: SP10

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: To include a smaller site at Gelli Bach, seek to increase the flexibility of housing supply through appropriate greenfield sites

Item Question Representation Text

2 2 Policy Number
SP10

11 11 Site Name
Gelli Bach

12 12 Site Reference
125

Representation Details

by: Representation No

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14 14 Representation

Please see attached correspondence. Option 2 northern Field

This Annex sets out the detailed case in support of these representations.

It provides both a critique of the current provisions of the plan, and suggested changes to its content.

The representations are structured as follows:

- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
- An Assessment of the Suitability of Site for Development;
- A Summary of the Suitability of Site for Development;
- Requested / recommended changes to the Plan.

Summary of Overall Position

An overview / summary of the position taken and evidence put forward by these representations is provided below:

- It is considered that the Plan's overall supply for housing underprovides as opposed to overprovides – particularly as it is considered that the LDP's proposed brownfield strategy will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan.
- The plan overestimating the speed in which development can be brought forward on a number of brownfield sites, and does not allow for a range and choice of sites to come forward as and when they are required. Accordingly, it is our view that the proposed primarily brownfield strategy should be amended to include a number of appropriate greenfield sites that are able to come forward in a timely manner in response to market demands.
- An additional 'contingency' of housing land supply should therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period – which further makes the case for the need for additional housing allocations particularly on greenfield sites which are likely to be deliverable within the early periods of the plan.
- Residential development is in principle appropriate within Castleton, as the settlement has been assessed as being well provided for in terms of services and facilities..
- The proposed site on at Gelli Bach is considered to be a suitable site for residential development, particularly in view of the following factors:
 - o There are no economic constraints which will affect the development of the site within the plan period.
 - o The landowner is in agreement with the proposed land use of the site.
 - o Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
 - o The site is located within close proximity of frequent public transport services.
 - o The site is accessible to local destinations on foot.
 - o Castleton and Marshfield provide a range of services, amenity facilities, shops and services.
 - o The development of additional residential units will further sustain the existing services within Castleton and Marshfield.
 - o The site is not subject to any ecological designations. The site's location provides an opportunity for residential development which would be neither prominent nor isolated.
 - o Existing mature planting / hedgerows, could be maintained and / or supplemented.
 - o The site is at no risk of flooding.

Consideration of Housing Supply by the Plan

Overall / Plan-Wide Housing Land Supply

Housing Requirement / Strategy

Policy SP10 of the Deposit LDP indicates that over the plan period (2011-2026) sufficient land will be made available to provide for 8,750 dwellings. It is stated that the land to meet this requirement will be primarily previously developed / brownfield land. It is noted in paragraph 2.38 that the supply of housing land in the plan includes many sites that were identified in the previously adopted UDP – and

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because of their size, many of them have substantial parts which are not yet started.

Within Section 5 – Housing, it is noted that in terms of existing commitments, including sites subject to S106 agreements and site under construction, there appears to be a potential over provision in the number of plots to meet the identified dwelling requirement over the plan period.

Notwithstanding this, it is considered that there is a fundamental issue in terms of the deliverability of the housing strategy as a result of the focus on brownfield sites. Brownfield sites, as previously developed sites are likely to have greater site constraints with the potential need for site remediation works etc. Accordingly, brownfield sites can often have higher development costs and take longer to develop. Given the present economic climate there is a need for readily developable and economically viable sites to be identified.

Conversely, greenfield sites, which by their nature are likely to be less constrained, and therefore quicker to be brought forward for development within the early stages of the plan period, would balance out the likely delays in bringing forward development on the brownfield sites.

Despite the overprovision in plots which appears to exist it is considered that a primarily brownfield strategy will not allow the level of annual completions to be met in order to meet the housing need that has been defined.

Deliverability Issues with Primarily Brownfield Only Strategy

Table 5 within the Housing Background paper (April 2012) provides a detailed analysis of the relative number of completions between brownfield and greenfield sites in the last 5 years.

Period	Total Completions	Total Greenfield Completions	Total Brownfield Completions	% of Brownfield completions as overall housing supply
2006/7	462	169	293	63
2007/8	571	157	414	73
2008/9	582	87	495	85
2009/10	362	17	345	95
2010/11	361	0	361	100

This demonstrates that generally housing completions have been falling on an annual basis. Whilst this is in part due to economic issues, it is considered that is a result of a lack of greenfield completions contributing to the overall figure as they have been falling on an annual basis – and in 2010/11 there was not 1 completion on a greenfield site.

It is noted that the UDP provided for the phasing of the allocated housing sites over three successive five year periods – 1996 to 2001, 2001 - 2006 and 2006 to 2011 (the UDP was also based on a strategy of primarily brownfield only sites). The table below provides an overview of the completions during each period against the target UDP requirement:

Period	Average UDP requirement	Total Completions	Residual Requirements
1996 - 2001	1800	2184	+384
2001 - 2006	2000	2212	+212
2006 - 2011	3700	2558	-1142

It is considered that the above table demonstrates that, although completions have actually increased over each of the 5 year periods, that due to the small number of greenfield site having been built out (as evidenced in Housing Background Paper) as a result of the brownfield strategy this has resulted in the shortfall of housing completions which currently exists. This drop in completions over the last remaining years of the UDP is further evidence by the fact that in 2009 – 2011 on average there have been less than 400 completions per annum.

It is considered that all of the allocated housing sites are highly unlikely to come forward exactly as the phasing plan provides for, and that some sites timetabled for release early in the LDP period will be delayed.

In order to further demonstrate the over reliance upon brownfield sites, the following table provides an overview of the key strategic brownfield sites which were 'allocated' within the UDP and are now

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proposed to be included within the LDP – and the estimated units which will be delivered within the respective plan period.

UDP allocation / Units / LDP allocation / Units
H1(5) Glebelands /153 / H5 Glebelands / 153
H1(4) Adj Bus Depot & Newport Athletic /160 / H18 Newport Athletic Club / 200
Club
H1(14) & H1(45) Crindau /420 / H55 Crindau / 420
H1(54) Eastern Expansion Area /1100 / H3 Eastern Expansion Area / 1100
H1(44) Monmouthshire Bank Sidings /450/ H14 Monmouthshire Bank Sidings / 545
H1(50) Whitehead Works /400/ H51 Whitehead Works /400
H1(51) Pirelli Works / 150 / H4 Pirelli / 200
H1(53) Llanwern / 600 / H47 Glan Llyn / 2997

In addition to this it is estimated that 495 units will come forward on the Lysaghts Village (Orb Works) over the LDP plan period.

The above table demonstrates that there are a significant number of units on current allocated brownfield sites which have not come forward over the UDP period (with the majority of these not having seen any development at all). The proposed 'rolling forward' of these allocations is not fundamentally contested, however should the majority of these key sites (allocated to meet the housing requirement) not come forward early within the LDP plan period the housing requirement will not be met.

This issue is further evidence in the most recent Joint Housing Land Availability Study (2010). This confirms that of a number of the brownfield site listed above a significant proportion of the units fall within category 3 (sites where development is unlikely within the next 5 years due to major physical constraints).

Site /Units to be completed by 2015 /Category 3 units
Glan Llyn /575 / 3425
Pirelli Works /150 / 50
Eastern Expansion Area /150 /950
Cindau /50 / 370
Monmouthshire Bank Sidings / 200 / 250

Of the sites that have been listed it is also questionable whether the number of units specified to be delivered by 2015 will come forward.

In the case of Glan Llyn, following the approval of the recent reserved matters application for 301 units in 2011, it is not considered that 575 units can be delivered by 2015. Not only have less than the 575 units been granted planning permission to date as part of the first phase of the scheme, but this would require in the region of 143 units to be completed per annum over the next 4 years. This is considered an extremely unlikely rate of house building for a single site, particularly in the current housing market when sales could be slow.

Accordingly, it is considered likely that the Authority will be "behind" in providing the required housing numbers before the end of the first phase of the LDP (in 2016).

In view of this, it is considered that the LDP's proposed brownfield strategy will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan. In particular, should only one or two housing sites be delayed in coming forward within the first 5 year periods of the Plan (i.e. 2011 – 2016) then the Authority will already fall behind in providing sufficient housing to provide for assessed needs.

This is considered to be particularly likely due to the Council's reliance on / priority given to brownfield sites. Brownfield sites, in their nature, are likely to have more remediation and infrastructure needs resulting in higher development costs and greater potential for development delays. It is therefore considered likely that a number of the brownfield sites proposed for development, will not come forward during this time and / or will provide for lower numbers of units than is currently provided for. Accordingly it is considered that there is requirement to allocate a number of greenfield sites as part of the LDP in order to allow a more equitable and suitable approach in meeting the housing requirement over the plan period.

Infill Issue

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It is noted that in the region of 15% of the Newport's total dwelling supply over the plan period is comprised of potential development from windfall sites (525 units from small windfall sites less than 10 dwellings and 750 units from large windfall sites more than 10 dwellings), which relates to approx 85 dwellings per annum. It is not considered sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites

In 2009/10 the total number of dwellings that came forward through small sites was 33 units and in 2010/11, 40 units came forward - as confirmed within the Housing Background Paper (April 2012). Whilst it is noted that average levels (in the context of the LDP) of windfall development have historically been seen in Newport, it is not considered that this is a trend that is able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller 'pool' of potential windfall sites being available. Therefore, as the levels of potential windfall sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.

Furthermore in relation to small sites, the total number of completions in the last five years as a % of the overall number of completions has average 8.6%. On this basis alone the windfall allowance for small sites over the plan period would need to be in the region of 750 units – some 225 higher than accounted for within the LDP.

Accordingly, based on these more recent trends, it is not considered that the housing provision on small windfall sites will be developed at anywhere near the level of 35 dwellings per annum anticipated and proposed, or 50 dwellings per annum on sites of 10 or more.

It is therefore considered that the LDP overestimates the levels of dwellings expected to come forward on windfall sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly this further establishes the need for the allocation of additional sites for residential development.

Summary

To summarise, it is our view that the Plan's overall supply for housing underprovides as opposed to overprovides – an approach which is inconsistent with the drive to re-stimulate the housing market as a result – due to legitimate concerns about the ability of a number of allocated brownfield sites (which are likely to have greater site constraints) to deliver the required / allocated numbers of units (particularly in the early phases of the Plan period), which further makes the case for the need for additional housing allocations - particularly on greenfield sites which are likely to be deliverable within the earlier periods of the LDP.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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To relay the findings of detailed work undertaken and to put forward the issues contained within these representations

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C2, CE1, CE2, CE3, CE4	
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Additional material submitted

Document: Deposit Plan, p.62

Site: 125/2062.C1 Gelli Bach

New Site

Policy: H01

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: To include small site at Gelli Bach, increase in housing numbers including the proposed site

Item Question Representation Text

2 2 Policy Number
H1

11 11 Site Name
Gelli Bach

12 12 Site Reference
125

Representation Details

Newport City Council Local Development Plan

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14 14 Representation

Please see attached correspondence. Option 2 - Northern Field. Please find enclosed, on behalf of and under instruction from Mr Mark Williams, representations to the Deposit LDP.

This submission:

- puts forward two Alternative Site Representations; and
- objects to selected policy provisions of the plan.

For each Alternative Site Representation, the following information is (as required) enclosed:

- completed, signed and dated Deposit Plan Response Forms;
- a Landscape Assessment;
- Red line plan.

The two Alternative Site Representations are referred to as follows:

- Option 1 Whole Site;
- Option 2 Northern Field.

The Alternative Site (Option 1) was previously submitted for consideration as part of the candidate sites process of the emerging LDP (site ref: 125). We would also like to confirm that we are now acting for Mr Williams in relation to the LDP process and could you please update your records accordingly.

Although two options for the development of the site are put forward as part of these representations, we consider that Option 1 – Whole Site represents the most suitable and acceptable development scheme for the site – particularly in view of securing viability for the scheme as a whole, and the need to provide readily available sites that are appropriate for residential development to cater for the housing requirements of the plan. Option 1 is therefore the preferred option. However and notwithstanding this, in order to provide a degree of flexibility (and without prejudice to our considered position on the merits of the preferred option), the other development option put forward allows for the development potential of the site to be fully and adequately assessed.

Furthermore, and as an Annex to this letter, a detailed case (providing a critique of the current provisions of the plan and suggested changes to its content) is included, in support of, and to make the case for the inclusion of the Alternative Sites; and suggested changes to the provisions of the Plan's policies.

The Annex addresses the following issues, and is structured accordingly:

- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
- An Assessment of the Suitability of Site for Development;
- A Summary of the Suitability of Sites for Development;
- Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to allocate the sites put forward.

Assessment of the Suitability of the Settlement for Development

The site is located within the current adopted UDP directly adjacent to the settlement limits of Castleton. Accordingly it occupies a position which is within close proximity to the existing settlement. Castleton, and Marshfield, within the Deposit LDP are identified as one of the 15 villages within the Authority.

Representation Details

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Castleton has the following services and facilities:

- Police Station
- Church
- Petrol Filling Station and Shop
- Public House
- Hotel

In addition, Marshfield provides the following services and facilities:

- 2 Public Houses
- Local Shop
- Post Office
- Recreation Ground
- 3 Areas of informal Open Space
- Community Centre

Accordingly, it is considered that collectively both settlements are well provided for in terms of services and facilities – at least in so far as providing and meeting 'day to day' needs and services relied upon by residents. The settlements are considered 'self sufficient' and 'sustainable' in this respect. It is therefore clear that additional residential development would, in principle, be appropriate within the settlement of Castleton.

It is considered that, in addition to being suitable for residential growth, additional housing development would assist in ensuring the continued viability of the existing shops and services within both the settlements, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.

Assessment of the Suitability of Site for Development

In assessing the suitability of the site for development a number of key issues need to be considered in detail. These are as follows:

- Overview of Key Considerations relating to the site
- Assessment of the site as part of the Candidate Sites Process

Overview of Key considerations relating to the site

The proposed site is located adjacent to the settlement of Castleton. In terms of the key characteristics of the site the following points are of relevance:

- The site encompasses an area of rough grassland, comprising of 2 flat fields
- The site is bound (and enclosed) by the following physical / 'defensible' boundaries:
 - North: existing dwelling and large factory
 - East: mature boundary of trees and existing mature hedgerows
 - South: existing road and dwellings
 - West: existing dwellings
- Access to the site for vehicles is currently provided directly to the north of the site
- There is a band of existing trees running horizontally across the site.

It is considered that the site is relatively well-placed (in comparison to many site's within the locality in terms of its credentials for allocation with LDP for residential development, as detailed below:

- The site is located within close proximity to the existing settlements of Castleton and Marshfield (i.e. designated settlements within the UDP and Deposit LDP).
- Located adjacent to the site on Marshfield Road are bus stops providing NW-bound and S-bound services. The site is also located 640 metres south of the Castleton (SW-bound

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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and NE-bound) bus services which provide regular and also direct services to Cardiff and Newport.

- The site is closely related to the existing settlement of Castleton. In light of the site's location on the boundary of the settlement limit, and its enclosure by existing development / highways / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjacent to Castleton (and could be considered and presented as appropriate 'rounding-off' the existing settlement).
- The site is bound on all sides by existing development, highways and mature landscaping – it is therefore enclosed by 'defensible' boundaries to all aspects and cannot be considered to be 'open countryside'.
- The site does not encompass brownfield / previously developed land (i.e. it is a greenfield site). However, in its favour, it is not of high agricultural quality, and has limited existing features which would pose a constraint to development (other than existing hedgerows).

Assessment of the site as part of the Candidate Sites Process

An assessment of the candidate sites was undertaken by Atkins as part of the Sustainability Appraisal / Strategic Environmental Assessment. Within their report, the candidate sites for Castleton appear to be assessed as a whole and the following key conclusions / recommendations were provided:

- Taken together the sites are likely to have a significant effect on the landscape and townscape as they pose a significant increase to the settlement
- PROWS should be retained
- Sites should be surveyed for potential for providing habitats for important species
- The sites could include some employment / mixed use development
- Dedicated walking and cycling routes could be provided

A more detailed response to the candidate site submission was provided by the LPA as part of the overall responses. These suggested that:

- The site is in green wedge and a special landscape area
- The plan is based on a brownfield site strategy
- Potential landscape and visual impacts could arise
- The site is subgrade 3a agricultural land
- The proposed site is located within an area where there is a shortfall of play space- and accordingly a LEAP would need to be provided.

It is considered that in relation to the above conclusions there are no significant constraints to the development of this site.

In response to the main issue - effect on landscape / townscape, in order to consider this point more comprehensively, so that a balanced assessment concerning the impact of any residential allocation on the countryside can be arrived at, a landscape assessment was undertaken.

It is noted in the conclusions of the report that although the site is located within a semi-rural context, as a result of the topography of the surrounding landscape to the south and the west – combined with existing hedgerows, trees, in the immediate area, views of the site are predominately screened from the majority of public vantage points. In summary, as the site is adjacent to existing housing, its development for residential purposes would be neither prominent nor isolated and could compliment the semi-rural character of Castleton.

In terms of each of the 2 Options, an indicative landscape / development strategy is provided in the report. An overview of these is provided below Option 1 Whole Site

- Concentrating housing to the northern land parcel ensures the houses are extremely well screened due to existing hedgerows and mature trees with a transition from higher density in the north to lower density / open space in the south.
- The retention of the majority existing mature trees which 'split' the fields, and are located to the east of the site, along with the retention of the existing hedgerow to the north and the proposed new planting to the south east will maintain and enhance / preserve the existing character of the surrounding landscape and provide an appropriate interface with the rural landscape beyond.
- Proposed public open space to the south west of the site and a sensitive housing density in the southern field parcel ensures a gradual transition between built form to maintain the existing

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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character of Bakery Lane and the surrounding area.

Option 2 – Northern Field

- Development in the northern field ensures the houses are extremely well screened due to existing hedgerows and mature trees. This will ensure that there is no visual harm on the adjacent landscape / countryside.

Assessment of Green Wedge / Special Landscape Designation

The purpose of the green wedge and special landscape area is to prevent urban coalescence— however the 'open' nature of the green wedge would not be significantly altered by the development of this site. Although the site is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

In addition, the site is not afforded any further policy protection for nature conservation interests etc, over and above the green wedge and special landscape designations. As such, in light of the above, it is considered that the potential harm caused to the green wedge by the development of the site would potentially be minimal, and would potentially be outweighed by other considerations.

In summary an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the countryside. In particular, existing mature planting / hedgerows which surround the site, could be maintained and / or supplemented to ensure a sensitive scheme, which maintains the village's setting within the rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed.

Summary of the Suitability of Site for Development

As outlined above the proposed site at Gelli Bach represents a site which is considered to be suitable for residential development.

In summary therefore, the site is considered to be suitable for residential development for the following reasons: Economic Viability

- There are no economic constraints which will affect the development of the site within the plan period.
- The landowners are in agreement with the proposed land use of the site.
- There are no restrictive covenants relating to the use of the land.
- The site is able to be served to by existing utilities infrastructure.

Highways

- Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.

Sustainability

- The site is located within close proximity of bus stops.
- The site is accessible to local destinations on foot.
- The settlements of Castelton and Marshfield provide a range of services / facilities.
- The development of additional residential units will further sustain the existing services within the settlements.

Environmental Health / Amenity

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

Representation Details

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Biodiversity / Landscape

- It is considered that the development proposal will not have any negative impact on the surrounding countryside.
- Any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the site from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the site from the special landscape area.
- Policy SP10 Residential Requirement – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher 'contingency' for flexibility over the Plan period.
- Policy H1 Housing Supply – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.

In addition, the Proposals Map of the LDP needs to be amended to include:

- The Alternative Site as a housing allocation (and within settlement limits) Removal of the site from the green wedge designation
- Removal of site from special landscape designation

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
To relay the findings of detailed work undertaken and to put forward the issues contained within these discussions.			

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C2, CE1, CE2, CE3, CE4	
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Item Question

Tick-box reply

8	8	Add a new site.	Yes
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Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2062.D9//SP08	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.20

Site: 372/ Gelli Bach (Curtilage)

Boundary
Change

Policy: SP08

Map: Inset 2: Marshfield and Castleton Village
Boundary

Summary: To remove the designation of Special Landscape Area from the curtilage of the property at Gelli Bach

Item Question *Representation Text*

2 2	Policy Number
SP7	

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Please see attached correspondence. This submission objects to the inclusion of the part of the residential curtilage / garden of Gelli Bach within Policy SP7 Green Wedges, Policy SP8 Special Landscape Area, and it accordingly not being located within the development / settlement boundary.

Gelli Bach is a large detached property, with an associated large garden / curtilage located in Castleton. The deposit LDP proposals map and inset map for Castleton, excludes a proportion of the garden / residential curtilage from the development / settlement boundary of the village. This accordingly is located outside of the development boundary and is allocated as a green wedge and special landscape area. A site location plan showing the dwelling and its associated garden / curtilage is included.

Case for Removal of the Garden / Curtilage from Green Wedge and Special Landscape Area

The purpose of the green wedge (primarily) and special landscape area is to prevent urban coalescence – however the 'open' nature of the green wedge would not be significantly altered by not including the garden / curtilage within the designation. Although part of the garden is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

In addition, the site as a whole is not afforded any further policy protection for nature conservation interests etc, over and above the green wedge and special landscape designations. As such, in light of the above, it is considered that the potential harm caused to the green wedge by removal of the garden would not raise any issues. In any event the garden benefits from permitted development rights (as it is part of the domestic curtilage of the dwelling) and / or could be used to erect domestic paraphernalia in any event. This demonstrates that the inclusion of a proportion of the garden within the designations is not sound in terms their overriding planning policy justification. Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the garden / curtilage from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the garden / curtilage from the special landscape area.

In addition, the Proposals Map of the LDP needs to be amended to include:

- Removal of the garden / curtilage from the green wedge designation.
- Removal of the garden / curtilage from the special landscape designation.
- Inclusion of the entire garden / curtilage of the site within the development boundary.

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
To relay the findings of detailed work undertaken and to put forward the issues contained within these representations.			

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
C2, CE4			

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2062.D10//SP07	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.19		Site: 373/ Gelli Bach (Curtilage)		Boundary Change						
Policy: SP07		Map: Inset 2: Marshfield and Castleton Village Boundary								
Summary: To remove the designation of Green Wedge from the curtilage of the property at Gelli Bach										

Item Question Representation Text

2 2 Policy Number
SP7

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

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Gelli Bach is a large detached property, with an associated large garden / curtilage located in Castleton. The deposit LDP proposals map and inset map for Castleton, excludes a proportion of the garden / residential curtilage from the development / settlement boundary of the village. This accordingly is located outside of the development boundary and is allocated as a green wedge and special landscape area. A site location plan showing the dwelling and its associated garden / curtilage is included.

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The purpose of the green wedge (primarily) and special landscape area is to prevent urban coalescence – however the 'open' nature of the green wedge would not be significantly altered by not including the garden / curtilage within the designation. Although part of the garden is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

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In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the garden / curtilage from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the garden / curtilage from the special landscape area.

In addition, the Proposals Map of the LDP needs to be amended to include:

- Removal of the garden / curtilage from the green wedge designation.
- Removal of the garden / curtilage from the special landscape designation.
- Inclusion of the entire garden / curtilage of the site within the development boundary.

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
To relay the findings of detailed work undertaken and to put forward the issues contained within these representations			

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
C2, CE4			

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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2062.D11//H01	Williams, Mr Mark	Geraint John Planning		28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.62

Site: 371/ Gelli Bach

Boundary Change

Policy: H01

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: Amend the settlement boundary to include land at Gelli Bach

Item Question Representation Text

14 14 Representation

Case for Inclusion of Garden / Curtilage within Development Boundary

It is recognised that development boundaries are generally accepted as an essential tool for the control of development – principally to prevent the unregulated encroachment of development into the countryside.

In addition to the general permitted development rights that exist for the garden / curtilage the dwelling (including the curtilage of the property) would be considered as previously developed land in the accordance with the definition provided in figure 4.1 of PPW.

Accordingly there is no justification for the allocation of a proportion of the garden curtilage as a green wedge or special landscape area – as it cannot be considered as countryside – and following this required change the development boundary so be amended in response.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP7 Green Wedges – Removal of the garden / curtilage from the green wedge designation.
- Policy SP8 Special Landscape Area – Removal of the garden / curtilage from the special landscape area.

In addition, the Proposals Map of the LDP needs to be amended to include:

- Removal of the garden / curtilage from the green wedge designation.
- Removal of the garden / curtilage from the special landscape designation.
- Inclusion of the entire garden / curtilage of the site within the development boundary.

It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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Item Question Soundness Test

1	1	I think the LDP is sound.	No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2063.D1//R6	Friends Life Company Limited c/o AXA Real Estate	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.92

Site: 358/ Newport Retail Park

Boundary
Change

Policy: R6

Map: Inset 25: Newport Retail Park District Centre

Summary: Seeking to have Newport Retail Park included in the R5 Policy

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
4	4	The Proposals Map Reference to Newport retail Park District Centre	Yes
5	5	Inset Plan(s) inset 25	Yes
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Newport Retail Park	

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Please see covering letter dated 28 May 2012 for full reasons and justification. A Sustainability Appraisal has also been included for the extended site area.

Change sought: amend Newport Retail Park District Centre boundary to include Matalan, Dutton Forshaw and land adj Seven Stiles Avenue as per the attached plan

Background

Newport Retail Park is currently allocated within the adopted Unitary Development Plan (UDP) as a District Centre - FLCL's land is located within its boundary. FLCL's interest relate to two units, Matalan and Dutton Forshaw, as well as the undeveloped land in between. This vacant site is also identified as a retail commitment in the adopted UDP and has an extant permission for two large scale retail units, approved in 2009.

FLCL's ownership is identified within the enclosed plan, which was also submitted as part of the Candidate Site representation in May 2009.

Newport Retail Park's allocation as a District Centre has previously been considered as part of the formal UDP process and was subsequently endorsed by the appointed Inspector following the Public Inquiry.

The Inspector's report makes clear reference to the need for this District Centre to support the eastern expansion area, which continues to be supported within the DLDP as a key strategic site. It is noted that the Retail Park offers a wide range of goods and services that would be available to future residents of the eastern expansion area and that there was an overriding advantage to be gained by its allocation as a District Centre.

The DLDP proposes to reduce the area covered by the District Centre and unjustifiably prevent due consideration of future retail proposals in this area.

Objections

Objection forms are included in relation to the following policies, text and inset plans/proposals map.

Objection to LDP draft proposals map/proposal map inset 25 – Newport Retail Park

An objection is made in relation to the site boundary for the Newport Retail Park District Centre (NRPDC), as indicated within the proposals map/inset map.

The area excludes land under FLCL's control, which was previously included within the District Centre designation, as set out within the UDP and the East Newport Development Framework Supplementary Planning Guidance.

The UDP also included a retail commitment designation on the vacant site, adjacent Seven Stiles Avenue (between the Matalan and Dutton Forshaw sites). This has also been removed from the DLDP proposals map without justification as the permission remains extant.

The inclusion of the FLCL land within the District Centre was fully considered by the UDP Inspector within the report on objections, at paragraph 6.60 to 6.65, and under the recommendations R6.9 and R6.10 (extracts attached).

The Inspector noted that Newport Retail Park was not within the eastern expansion area, however it does adjoin it and there was potential for direct access from the park into the former steelworks site. Furthermore, additional links were planned in order to improve links to the Greenfield land to the north of the railway line, also designated for residential development. Newport Retail Park was considered to be worthy of designating as a District Centre given its existing, thriving shopping centre and its capability to serve the eastern expansion area from the outset. The area covered by the designation has been reduced without justification in the DLDP.

The Inspector also considered the additional caveats that the Council was seeking to place on its designation as a Retail Park by proposing to restrict new floorspace to that which would serve solely the eastern expansion area. Furthermore, new developments would need to be specifically justified on the basis of a district shopping centre function so as not to result in any adverse impact on the city centre. The Inspector found these additional caveats to be unnecessary and contrary to guidance contained within Planning Policy Wales (PPW).

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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Similar caveats are proposed to be reintroduced into the DLDP without justification. The proposed caveats remain contrary to PPW and are objected to in further detail below.

The eastern expansion area remains a firm commitment with an allocation for up to 5,100 dwellings, with work having commenced in the last year. Together with this level of housing provision, the Council are seeking to allocate new residential sites in the form of the Woodland site, Ringland (H56) and Hartridge Farm Road (H57). This would add a further 600 dwellings to this area, in addition to the eastern expansion area (H3) commitment of 1,100 dwellings and the Glan Llyn (H47) proposals for 4,000 units. Large scale employment land commitments and designation are identified within the DLDP UNDER Policy EM1, which will also create significant demand for a sustainable District Centre in addition to the housing planned.

The NRPDC currently serves the existing population and its catchment and will also be required to provide for a further 5,700 dwellings proposed/committed as part of the DLDP.

The UDP Inspector was content with the boundaries of the District Centre designation at the time of the UDP inquiry. Given that the surrounding commitments remain and have been added to in terms of catchment population, there is no justification for reducing the District Centre boundary, as proposed within the DLDP.

As a consequence, the District Centre boundary should be reinstated within the DLDP proposals map and the NRPDC inset map should be revised, as per the enclosed plan.

Change sought: amend Newport Retail Park District Centre boundary to include Matalan, Dutton Forshaw and land adj Seven Stiles Avenue as per the attached plan

Summary and conclusions

FLCL objects strongly to the reduction in the boundaries of the NRPDC as proposed by the DLDP. The District Centre designation was considered and endorsed by the UDP Inspector and subsequently formed part of the adopted UDP. Likewise, the District Centre boundaries were considered and adopted as part of the eastern expansion area SPG. There is no justification for the reduction in the boundaries from that adopted within the UDP and the objection is made on the basis that the boundaries should be reinstated as per the enclosed plan.

Furthermore, the DLDP seeks to reintroduce additional caveats and controls over future developments within NRPDC, which had previously been considered as unnecessary by the UDP Inspector. Our objections seek to remove those to ensure that the District Centre is subjected to policies which are appropriate to its location, status and future role and, more importantly, to ensure that the plan is compliant with PPW.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary, contrary to the previous endorsement by the UDP Inspector requires full examination.

Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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See covering letter dated 28 May 2012 for full background The plan fails C1,C2, CE1 & CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2063.D2//R6	Friends Life Company Limited c/o AXA Real Estate	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

SA/SEA submitted

Document:Deposit Plan, p.92

Policy: R6

Summary: Request that Newport Retail Park is designated as a District Centre under Policy R5.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number R5	
7	7	A new paragraph or new text.	Yes
11	11	Site Name Newport Retail Park	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Objection to draft Policy R5 - Retail Proposals in District Centres - See covering letter dated 28 May for full objection.

Policy R5 covers District Centres but excludes Newport Retail Park. It sets out the criteria based policy for proposals within and adjacent to district shopping centres. The exclusion of Newport Retail Park from the application the retail tests of the sequential and need contradicts the direction of the UDP Inspector when previously considering the caveats to the Newport Retail Park policies.

Changes required: include Newport Retail Park District Centre within the list of centres referred to in Policy R5.

Background

Newport Retail Park is currently allocated within the adopted Unitary Development Plan (UDP) as a District Centre - FLCL's land is located within its boundary. FLCL's interest relate to two units, Matalan and Dutton Forshaw, as well as the undeveloped land in between. This vacant site is also identified as a retail commitment in the adopted UDP and has an extant permission for two large scale retail units, approved in 2009.

FLCL's ownership is identified within the enclosed plan, which was also submitted as part of the Candidate Site representation in May 2009.

Newport Retail Park's allocation as a District Centre has previously been considered as part of the formal UDP process and was subsequently endorsed by the appointed Inspector following the Public Inquiry.

The Inspector's report makes clear reference to the need for this District Centre to support the eastern expansion area, which continues to be supported within the DLDP as a key strategic site. It is noted that the Retail Park offers a wide range of goods and services that would be available to future residents of the eastern expansion area and that there was an overriding advantage to be gained by its allocation as a District Centre.

The DLDP proposes to reduce the area covered by the District Centre and unjustifiably prevent due consideration of future retail proposals in this area.

Objections

Objection forms are included in relation to the following policies, text and inset plans/proposals map.

Objection to draft Policy R5 – Retail Proposals in District Centres

Policy R5 covers District Centres but excludes Newport Retail Park. It sets out the criteria based policy for proposals within and adjacent to district shopping centres. The exclusion of Newport Retail Park from the application the retail tests of the sequential and need contradicts the direction of the UDP Inspector when previously considering the caveats to the Newport Retail Park policies, as discussed above.

Paragraph 10.2.1 of PPW (4th edition) states that LPAs should set out a framework for the future of town and District Centres in their area, which promote a successful retailing sector supporting existing communities and centres.

It states that development plans should also establish the existing hierarchy of centres, identify those which fulfil specialist functions and be clear about their future roles. In this case, the role of NRPDC and its future function has already been assessed as part of the UD - to be required to serve the future needs of the eastern expansion area.

As highlighted above, this is an existing commitment, is extant, and draft allocations within the DLDP seek to extend this further through additional housing allocations. The future role of Newport Retail Park is, therefore, to both meet the needs of the existing community and the significant expansion of its catchment population within the plan period. As such, a reduction in the area and a restriction on any further retail development within the District Centre, as proposed by the DLDP is unjustified. As a consequence, NRPDC should be included within the list of District Centres referred to in Policy R5.

Change required: include Newport Retail Park District Centre within the list of centres referred to in Policy R5.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Summary and conclusions

FLCL objects strongly to the reduction in the boundaries of the NRPDC as proposed by the DLDP. The District Centre designation was considered and endorsed by the UDP Inspector and subsequently formed part of the adopted UDP. Likewise, the District Centre boundaries were considered and adopted as part of the eastern expansion area SPG. There is no justification for the reduction in the boundaries from that adopted within the UDP and the objection is made on the basis that the boundaries should be reinstated as per the enclosed plan.

Furthermore, the DLDP seeks to reintroduce additional caveats and controls over future developments within NRPDC, which had previously been considered as unnecessary by the UDP Inspector. Our objections seek to remove those to ensure that the District Centre is subjected to policies which are appropriate to its location, status and future role and, more importantly, to ensure that the plan is compliant with PPW.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary and the exclusion of the district centre from the same policy applied to other district centres is contrary to the previous endorsement by the UDP Inspector and to PPW, as such it requires full examination and representations to be made.

Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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13	13	Test of Soundness								
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See covering letter dated 28 May 2012 for full background The plan fails C1, C2, CE1 & CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2063.D3//R6	Friends Life Company Limited c/o AXA Real Estate	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.92

Policy: R6

Summary: Propose to delete Policy R6

Item Question Representation Text

2 2 Policy Number

R6

11 11 Site Name

Newport Retail Park

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Objection to draft Policy R6 - Newport Retail Park District Centre - Please see covering letter dated 28 May 2012 for full reasons and justification.

Draft Policy R6 states that no additional retail sales floorspace will be permitted at NRPDC.

The inclusion of this policy within the plan is contrary to PPW and damaging to the future health, attractiveness, vitality and viability of the District Centre.

The prevention of the provision of any new retail floorspace within the centre would also be contrary to PPW. Further development that would meet local and future needs could be directed elsewhere and would, therefore, be contrary to the aims of PPW to reduce car journeys and provide for accessible shopping features. In this regard, Policy R6 is contrary to national policy and should, therefore, be deleted.

Background

Newport Retail Park is currently allocated within the adopted Unitary Development Plan (UDP) as a District Centre - FLCL's land is located within its boundary. FLCL's interest relate to two units, Matalan and Dutton Forshaw, as well as the undeveloped land in between. This vacant site is also identified as a retail commitment in the adopted UDP and has an extant permission for two large scale retail units, approved in 2009.

FLCL's ownership is identified within the enclosed plan, which was also submitted as part of the Candidate Site representation in May 2009.

Newport Retail Park's allocation as a District Centre has previously been considered as part of the formal UDP process and was subsequently endorsed by the appointed Inspector following the Public Inquiry.

The Inspector's report makes clear reference to the need for this District Centre to support the eastern expansion area, which continues to be supported within the DLDP as a key strategic site. It is noted that the Retail Park offers a wide range of goods and services that would be available to future residents of the eastern expansion area and that there was an overriding advantage to be gained by its allocation as a District Centre.

The DLDP proposes to reduce the area covered by the District Centre and unjustifiably prevent due consideration of future retail proposals in this area.

Objections

Objection forms are included in relation to the following policies, text and inset plans/proposals map.

Objection to draft Policy R6 – Newport Retail Park District Centre

Draft Policy R6 states that no additional retail sales floorspace will be permitted at NRPDC.

The inclusion of this policy within the plan is contrary to PPW and damaging to the future health, attractiveness, vitality and viability of the District Centre.

Paragraph 10.2.8 of PPW states that policies should support the management of town centres to allow enhancement and promotion as an important factor in achieving vitality and viability of the centres. Preventing new floorspace within the centre would not only be contrary to the overall aims of PPW and TAN4, to support and concentrate new retail development within existing identified centres, it would also be damaging to the future investment and enhancement of the centre, to its long term detriment.

The prevention of the provision of any new retail floorspace within the centre would also be contrary to PPW. Further development that would meet local and future needs could be directed elsewhere and would, therefore, be contrary to the aims of PPW to reduce car journeys and provide for accessible shopping facilities. In this regard, Policy R6 is contrary to national policy and should, therefore, be deleted.

Change sought: delete Policy R6.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Summary and conclusions

FLCL objects strongly to the reduction in the boundaries of the NRPDC as proposed by the DLDP. The District Centre designation was considered and endorsed by the UDP Inspector and subsequently formed part of the adopted UDP. Likewise, the District Centre boundaries were considered and adopted as part of the eastern expansion area SPG. There is no justification for the reduction in the boundaries from that adopted within the UDP and the objection is made on the basis that the boundaries should be reinstated as per the enclosed plan.

Furthermore, the DLDP seeks to reintroduce additional caveats and controls over future developments within NRPDC, which had previously been considered as unnecessary by the UDP Inspector. Our objections seek to remove those to ensure that the District Centre is subjected to policies which are appropriate to its location, status and future role and, more importantly, to ensure that the plan is compliant with PPW.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary and the proposal to place more restrictions on the district centre than applied to other district centres is contrary to the previous endorsement by the UDP inspector and to PPW, as such it requires full examination and representations to be made.

Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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13	13	Test of Soundness								
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See covering letter date 28 May 2012 for full background The plan fails C1, C2, CE1 & CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2063.D4/8.18/R7	Friends Life Company Limited c/o AXA Real Estate	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.92, para.8.18

Policy: R7

Map: Inset 25: Newport Retail Park District Centre

Summary: Deletion of Policy R7 and supporting text.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number R7
3	3	Paragraph or section number(s) Para 8.18 and 8.23
11	11	Site Name Newport Retail Park

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Objection to draft Policy R7 - Newport Retail Park District Centre Proposals - Please see covering letter dated 28 May 2012 for full reasons and justification.

The inclusion of Policy R7 within the DLDP will be contrary to PPW and the aims to support the vitality and viability of District Centres.

Development within the NRPDC boundary (as proposed to be extended by these representations) should not be subject to any additional restriction compared with any other District Centres. To do so would prevent investment and improvement of the District Centre and its integration with the eastern expansion area and new residential areas to the north. As a consequence, Policy R7 should be deleted in its entirety along with the supporting text. On this basis, any control required to the Retail Park will be possible by including Newport Retail Park under Policy R5, as also proposed through representations.

Change sought: delete Policy R7 and delete supporting text at paragraphs 8.18 to 8.23

Background

Newport Retail Park is currently allocated within the adopted Unitary Development Plan (UDP) as a District Centre - FLCL's land is located within its boundary. FLCL's interest relate to two units, Matalan and Dutton Forshaw, as well as the undeveloped land in between. This vacant site is also identified as a retail commitment in the adopted UDP and has an extant permission for two large scale retail units, approved in 2009.

FLCL's ownership is identified within the enclosed plan, which was also submitted as part of the Candidate Site representation in May 2009.

Newport Retail Park's allocation as a District Centre has previously been considered as part of the formal UDP process and was subsequently endorsed by the appointed Inspector following the Public Inquiry.

The Inspector's report makes clear reference to the need for this District Centre to support the eastern expansion area, which continues to be supported within the DLDP as a key strategic site. It is noted that the Retail Park offers a wide range of goods and services that would be available to future residents of the eastern expansion area and that there was an overriding advantage to be gained by its allocation as a District Centre.

The DLDP proposes to reduce the area covered by the District Centre and unjustifiably prevent due consideration of future retail proposals in this area.

Objections

Objection forms are included in relation to the following policies, text and inset plans/proposals map.

Objection to draft Policy R7 – Newport Retail Park District Centre Proposals

Policy R7 sets out specific criteria in relation to the NRPDC stating that no new convenience retail floorspace should be allowed and no retail unit greater than 500 sq m should be permitted. There is a degree of contradiction between Policy R6 and R7 given that Policy R6 states that no new retail space would be permitted at NRPDC but Policy R7 goes on to state that if Policy R6 is satisfied, the restrictions would apply.

If no additional retail space can be permitted then there would be no need for Policy R7.

The inclusion of Policy R7 within the DLDP will, again, be contrary to PPW and the aims to support the vitality and viability of District Centres. The aims of Policy R7 to improve accessibility to adjoining residential development for pedestrians and cyclists could only be met through additional retail development and the forging of improved links and attractive pedestrian routes to the eastern expansion area. This would be best accommodated through new retail development within FLCL land, identified adjacent to Seven Stiles Avenue and through allowing additional floorspace within the currently vacant site (i.e. the site identified as a retail commitment within the Newport UDP).

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Development within the NRPDC boundary (as proposed to be extended by these representations) should not be subject to any additional restriction compared with any other District Centres. To do so would prevent investment and improvement of the District Centre and its integration with the eastern expansion area and new residential areas to the north. As a consequence, Policy R7 should be deleted in its entirety along with the supporting text. On this basis, any control required to the Retail Park will be possible by including Newport Retail Park under Policy R5, as previously proposed.

Change sought: delete Policy R7 and supporting text at paragraphs 8.18 to 8.23.

Summary and conclusions

FLCL objects strongly to the reduction in the boundaries of the NRPDC as proposed by the DLDP. The District Centre designation was considered and endorsed by the UDP Inspector and subsequently formed part of the adopted UDP. Likewise, the District Centre boundaries were considered and adopted as part of the eastern expansion area SPG. There is no justification for the reduction in the boundaries from that adopted within the UDP and the objection is made on the basis that the boundaries should be reinstated as per the enclosed plan.

Furthermore, the DLDP seeks to reintroduce additional caveats and controls over future developments within NRPDC, which had previously been considered as unnecessary by the UDP Inspector. Our objections seek to remove those to ensure that the District Centre is subjected to policies which are appropriate to its location, status and future role and, more importantly, to ensure that the plan is compliant with PPW.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary and the proposal to place more restrictions on the district centre than applied to other district centres is contrary to the previous endorsement by the UDP Inspector and to PPW, as such it requires full examination and representations to be made.

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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See covering letter dated 28 May 2012 for full background The plan fails C1, C2, CE2 & CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2063.D5//R11	Friends Life Company Limited c/o AXA Real Estate	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.96

Policy: R11

Summary: Delete policy Criterai R11(iv)

Item Question Representation Text

2 2 Policy Number

R11

11 11 Site Name

Newport Retail Park

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Objection to draft Policy R11 - New Out of Centre Retail Sites - Please see covering letter dated 28 May 2012 for full reasons and justification.

Policy R11 is considered to be broadly in accordance with PPW and TAN4. However, criteria (iv) states that any retail unit proposed, which is less than 500sq m, should not be allowed. The individual characteristics of any applications or proposals and their size will should be assessed against the retail tests set out in criterion (i) to (iii). Therefore, criteria (iv), which proposes a restriction on the size of proposed out of centre retail units, should be deleted as it does not,accord with national guidance.

Change sought: delete criteria (iv) of Policy R11.

Background

Newport Retail Park is currently allocated within the adopted Unitary Development Plan (UDP) as a District Centre - FLCL's land is located within its boundary. FLCL's interest relate to two units, Matalan and Dutton Forshaw, as well as the undeveloped land in between. This vacant site is also identified as a retail commitment in the adopted UDP and has an extant permission for two large scale retail units, approved in 2009.

FLCL's ownership is identified within the enclosed plan, which was also submitted as part of the Candidate Site representation in May 2009.

Newport Retail Park's allocation as a District Centre has previously been considered as part of the formal UDP process and was subsequently endorsed by the appointed Inspector following the Public Inquiry.

The Inspector's report makes clear reference to the need for this District Centre to support the eastern expansion area, which continues to be supported within the DLDP as a key strategic site. It is noted that the Retail Park offers a wide range of goods and services that would be available to future residents of the eastern expansion area and that there was an overriding advantage to be gained by its allocation as a District Centre.

The DLDP proposes to reduce the area covered by the District Centre and unjustifiably prevent due consideration of future retail proposals in this area.

Objections

Objection forms are included in relation to the following policies, text and inset plans/proposals map.

Objection to draft Policy R11 – New Out of Centre Retail Sites

Policy R11 is considered to be broadly in accordance with PPW and TAN4. However, criteria (iv) states that any retail unit proposed, which is less than 500sq m, should not be allowed. The individual characteristics of any applications or proposals and their size will should be assessed against the retail tests set out in criterion (i) to (iii). Therefore, criteria (iv), which proposes a restriction on the size of proposed out of centre retail units, should be deleted as it does not accord with national guidance.

Change sought: delete criteria (iv) of Policy R11.

Summary and conclusions

FLCL objects strongly to the reduction in the boundaries of the NRPDC as proposed by the DLDP. The District Centre designation was considered and endorsed by the UDP Inspector and subsequently formed part of the adopted UDP. Likewise, the District Centre boundaries were considered and adopted as part of the eastern expansion area SPG. There is no justification for the reduction in the boundaries from that adopted within the UDP and the objection is made on the basis that the boundaries should be reinstated as per the enclosed plan.

Furthermore, the DLDP seeks to reintroduce additional caveats and controls over future developments within NRPDC, which had previously been considered as unnecessary by the UDP Inspector. Our objections seek to remove those to ensure that the District Centre is subjected to policies which are appropriate to its location, status and future role and, more importantly, to ensure that the plan is compliant with PPW.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Yes							
16 16	Subject to speak on at Examination									
<p>The Newport Retail Park is a key element of the sustainable growth set planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary and the proposal to place more restrictions on the district centre than applied to other district centres is contrary to the previous endorsement by the UDP Inspector and to PPW, as such it requires full examination and representations to be made.</p>										
<i>Item Question</i>										
<i>Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness									
<p>See covering letter dated 28 May 2012 for full background The plan fails C1, C2, CE1 & CE4</p>										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2063.D6//R12	Friends Life Company Limited c/o AXA Real Estate	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.97

Policy: R12

Summary: Deletion of criteria (v) of Policy R12, restrictions to the size of proposed units in out of centre locations.

Item Question Representation Text

2 2 Policy Number

R12

11 11 Site Name

Newport Retail Park

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Objection to draft Policy R12 - Development of Existing Out of Centre Retail Sites - Please see covering letter dated 28 May 2012 for full reasons and justification.

Policy R12 is considered to be broadly in accordance with PPW and TAN4. However, criteria (v) states that any retail unit proposed, which is less than 500 sq m, should not be allowed. The individual characteristics of any applications or proposals and their size will should be assessed against the retail tests set out in criterion (i) to (iii). Therefore, criteria (v), which proposes a restriction on the size of proposed out of centre retail units, should be deleted as it does not accord with national guidance.

Changes sought: delete criteria (v) of Policy R12

Background

Newport Retail Park is currently allocated within the adopted Unitary Development Plan (UDP) as a District Centre - FLCL's land is located within its boundary. FLCL's interest relate to two units, Matalan and Dutton Forshaw, as well as the undeveloped land in between. This vacant site is also identified as a retail commitment in the adopted UDP and has an extant permission for two large scale retail units, approved in 2009.

FLCL's ownership is identified within the enclosed plan, which was also submitted as part of the Candidate Site representation in May 2009.

Newport Retail Park's allocation as a District Centre has previously been considered as part of the formal UDP process and was subsequently endorsed by the appointed Inspector following the Public Inquiry.

The Inspector's report makes clear reference to the need for this District Centre to support the eastern expansion area, which continues to be supported within the DLDP as a key strategic site. It is noted that the Retail Park offers a wide range of goods and services that would be available to future residents of the eastern expansion area and that there was an overriding advantage to be gained by its allocation as a District Centre.

The DLDP proposes to reduce the area covered by the District Centre and unjustifiably prevent due consideration of future retail proposals in this area.

Objections

Objection forms are included in relation to the following policies, text and inset plans/proposals map.

Objection to draft Policy R12 – Development of Existing Out of Centre Retail Sites

Policy R12 is considered to be broadly in accordance with PPW and TAN4. However, criteria (v) states that any retail unit proposed, which is less than 500 sq m, should not be allowed. The individual characteristics of any applications or proposals and their size will should be assessed against the retail tests set out in criterion (i) to (iii). Therefore, criteria (v), which proposes a restriction on the size of proposed out of centre retail units, should be deleted as it does not accord with national guidance.

Change sought: delete criteria (v) of Policy R12

Summary and conclusions

FLCL objects strongly to the reduction in the boundaries of the NRPDC as proposed by the DLDP. The District Centre designation was considered and endorsed by the UDP Inspector and subsequently formed part of the adopted UDP. Likewise, the District Centre boundaries were considered and adopted as part of the eastern expansion area SPG. There is no justification for the reduction in the boundaries from that adopted within the UDP and the objection is made on the basis that the boundaries should be reinstated as per the enclosed plan.

Furthermore, the DLDP seeks to reintroduce additional caveats and controls over future developments within NRPDC, which had previously been considered as unnecessary by the UDP Inspector. Our

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
		objections seek to remove those to ensure that the District Centre is subjected to policies which are appropriate to its location, status and future role and, more importantly, to ensure that the plan is compliant with PPW.								
15 15		Do you want to speak at Public Examination?							Yes	
16 16		Subject to speak on at Examination								
		The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary and the proposal to place more restrictions on the district centre than applied to other district centres is contrary to the previous endorsement by the UDP Inspector and to PPW, as such it requires full examination and representatons to be made.								
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>								
1 1		I think the LDP is sound.							No	
13 13		Test of Soundness								
		See covering letter dated 28 May 2012 for full background The plan fails C1, C2, CE1 & CE4								

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2072.D1//SP08	Newbridge Estates Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	

Additional material submitted

Document: Deposit Plan, p.20

Site: 345/ Gloch Wen

Boundary Change

Policy: SP08

Summary: To amend a Special Landscape Area boundary to exclude land at Gloch Wen

Item Question Representation Text

2 2 Policy Number

SP8 -Special Landscape Areas

9 9 Amend the boundaries of an existing site.

Yes

11 11 Site Name

Land at Glochwen Rhiwderin

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

1.0 Introduction

1.1 Newbridge Estates Ltd objects to the inclusion of land at Glochwen within the West of Rhiwderin Special Landscape Area designation. The land concerned is shown on the attached plan.

1.2 Inclusion of this land within the West of Rhiwderin Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests:

CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;

CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and

CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

LANDMAP Designation

2.1 In terms of the evidence base for the designation of the Special Landscape Areas (SLA) as referred to in the Deposit Plan there are a number of issues which need to be addressed.

2.2 Firstly the use of the LANDMAP information system in determining potential SLAs within Newport is driven by Planning Policy Wales (2011 4th Ed) in which Paragraph 5.3.13 states that LANDMAP "...can help to inform supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design)".

2.3 However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst Planning Policy Wales states that the data should 'help to inform' supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.

2.4 In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP Information Guidance Note 1 is 'coherence.' This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of a distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.

2.5 Concern is also raised in relation to the definition of boundaries. The TACP Report -Designation of Special Landscape Areas (2009), which is appended to the Background Paper, highlighted the need for the subsequent confirmation of the detailed boundaries by the Authority.

2.6 In this regard paragraph 5.2 of the SLA Background Paper states that "The proposed SLA boundaries for the LOP are justified as being located either: along Newport Authority's administrative boundary, the proposed settlement boundary from the LOP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous".

2.7 However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach they Authority have defaulted to the use of the settlement boundaries. While in some instances edge of settlement may be justified as the boundary in special landscape terms, in the majority of cases, it appears to be used without regard to landscape quality and adjoining influences.

2.8 We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries so as to include only those landscapes worthy of protection by virtue of their special status.

3.0 Special Landscape Area Boundary

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3.1 Given the above comments on the LANDMAP assessment and subsequent concerns over the definition of the boundaries proposed by the Authority Soltys Brewster Consulting have carried out a landscape and visual assessment of the area.

3.2 The landscape assessment of the wider surrounding area by Soltys Brewster, based on a previous landscape and visual work undertaken for the application and appeal at Glochwen, Rhiwderin, comprising of fieldwork and desk-based study previously identified five general landscape character areas contained within and surrounding the site. Of the five character areas identified it was concluded that the site, adjoining the settlement boundary of Rhiwderin, falls mainly within the Valley Sides which is characterised by and comprises of both urban and rural landscapes and contains the transitional urban rural fringe zones. Therefore, the site at Glochwen and surrounding area within the Valley Side classification are subject to urban and human influences and whilst they may have some local intrinsic interest through their mature network of hedgerows, hedgerow trees and woodland copse it is considered that these landscapes are generally of Medium quality, and do not warrant a Special Landscape Designation.

3.3 In considering the above it is therefore unclear whether all landscapes within the proposed designated area are worthy of equal protection and that a more detailed assessment of the boundaries should be undertaken rather than default to the settlement boundary

4.0 Required Change:

4.1 That the site at Glochwen be removed from the West of Rhiwderin Special Landscape Area.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination Due to the significant issues raised in the representations	
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Please refer to the attached representation	
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2072.D2//SP05	Newbridge Estates Ltd	Boyer Planning - Cardiff		28/05/2012	<input type="checkbox"/>	P	O		M	
		Additional material submitted	SA/SEA submitted							
Document: Deposit Plan, p.18		Site: 346/ Gloch Wen			Boundary Change					

Policy: SP05

Summary: To include site proposed in area currently allocated as Countryside

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP5 -Countryside	
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name Land at Glochwen , Rhiwderin	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

1.0 Introduction

1.1 Newbridge Estates Ltd objects to the inclusion of land at Glochwen within the Countryside and the omission from within the settlement Boundary of Rhiwderin. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:

C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 –Housing Sites it is noted that whilst Newport are utilising the Welsh Government projections the implications of the Newport City Council Local Housing Market Assessment have not been fully taken into consideration.

2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

2.3 In considering the above the separate Housing submission recommends that a housing requirement be set that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. This has been estimated at a requirement of around 12,494 dwellings. In addition to this it is recommended that an additional 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates should be added. Consequently this generates an estimated requirement provision figure for the plan period of 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

2.4 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Rhiwderin to incorporate the site at Glochwen would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.5 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.6 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2011 4th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.7 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence

2.8 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.9 The characteristics and location of the site at Glochwen accords with the relevant criteria in order to provide a sustainable settlement extension:

- The site immediately adjoins the settlement boundary of Rhiwderin and is subject to urban influences;
- The extension of the settlement to provide residential development would be wholly compatible with the with neighbouring established land uses;

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car, and
- The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available

2.10 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at Glochwen as a housing allocation site and the consequent inclusion within the settlement boundary of Rhiwderin has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.

4.0 Required Change:

4.1 That the site at Glochwen be removed from the Countryside and the settlement boundary for Rhiwderin be amended to include land to the as shown on the attached plan.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination Due to the significant issues raised in the representations	
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Please refer to the attached representation	
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Item Question

Tick-box reply

8	8	Add a new site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2072.D3//H01	Newbridge Estates Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.62

Policy: H01

Summary: To allocate more land for housing to meet the local housing demand

Item Question *Representation Text*

2 2 Policy Number

H1 - Housing Sites (Numbers)

11 11 Site Name

Land at Glochwen, Rhwiderin

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Policy Reference: Policy H1 Housing

1.1 On behalf of Newbridge Estates Ltd we object to the approach taken by the Deposit LDP with regards to the housing requirement.

1.2 We consider the approach taken by the Council against the requirements of Planning Policy Wales (PPW), which sets out criteria that Local Authorities must take account of when setting their housing requirement. Whilst the Authority has used the WG projections as their starting point, they plainly ignore the implications of the Local Housing Market Assessment that they have submitted as part of their evidence base which when based on up to date information and extrapolated forward indicates a much higher level of need than provided for.

1.3 We also consider that it is inappropriate to rely upon a number of the sites identified within policy H1 that are subject to numerous constraints and have remained undeliverable for some time. A number of such sites are identified as "new allocations" whereas in reality they have been carried through previous plans with no developer interest or signs of such interest.

1.4 In this context and based on our consideration of the Plan in relation to National Policy requirements, it is our view that the housing requirement is wholly inadequate and contrary to the following tests of soundness:

- C1 in that it does not have proper regard to other plans, policies and strategies relating to the area;
- C2 in that the housing provision strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- C3 in that it does not have regard to the Wales Spatial Plan;
- C4 as it does not have regard to the relevant community strategy;
- CE1 in so far as the proposed housing provision strategy does not flow logically from the proposed strategy of the plan;
- CE2 in that this level of housing is not realistic and appropriate having considered the alternatives and is not founded on a robust and credible evidence base in terms of local need;
- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local needs and promote future economic growth.

1.5 Accordingly, in order to make the plan sound it is necessary for the Council to increase the housing requirement and to identify a robust and deliverable supply of land for housing. We set out our reasoning in the following paragraphs.

2.0 Factors Underpinning the Housing Requirement

2.1 Para 9.2.1 of Planning Policy Wales (4th edition) indicates that in planning the provision for new housing local authorities must take account of the following:

- People, Places, Futures -The Wales Spatial Plan;
- Statutory Code of Practice on Racial Equality in Housing -Wales;
- the Assembly Government's latest household projections;
- local housing strategies;
- community strategies;
- local housing requirements (needs and demands);
- the needs of the local and national economy;
- social considerations (including unmet need);
- the capacity of an area in terms of social, environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing;
- the environmental implications, including sustainable building standards (see Section 4.11), energy consumption, greenhouse gas emissions and flood risk;
- the capacity of the existing or planned infrastructure; and
- the need to tackle the causes and consequences of climate change.

2.2 Whilst 9.2.2 indicates that the starting point for assessing housing requirements is the latest Government Household projections but it is very clear that other sources of local evidence should be considered.

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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"In estimating housing requirements local planning authorities should integrate the provisions of their local housing strategies with the relevant provisions of their development plans".

2.3 PW expressly requires that Local Planning Authorities should consider the appropriateness of the projections for their area based on all sources of evidence including the need for affordable housing identified by their Local Housing Market Assessment (LHMA). I deal with this in more detail below, however, it is evident that the LHMA relied upon by Newport is both out of date (published in 2007) and plainly inaccurate in terms of its predictions of how matters would have proceeded over the 5 years following its publication to the present day.

2.4 Based on the Planning Policy Wales requirements, it is evident that having regards to the criteria listed, the Deposit LDP has significant shortcomings in relation not only to national guidance but also other plans, the community strategy, the evidence base, housing need and the Plan's own objective. We consider below the key elements in setting a housing requirement.

3.0 Strategies and Plans

The Deposit LDP Vision and Objectives

3.1 The Deposit LDP Objectives clearly set the context for what the policies within the Plan must achieve. Objective 4 seeks to ensure that there is an adequate supply of land for housing which meets the needs of the populations. It explains that the LDP proposes a level of housing that enables everyone to have access to decent housing.

3.2 The primary role of the subsequent policies within the LDP is clearly to help achieve the strategic objectives. It is evident that in this case these are not "cascaded down" into the policies within the Plan that are intended to implement the strategy. Indeed, the approach to housing provision adopted within the Deposit LDP is based on a LHMA (absent an up to date Assessment) that plainly identifies a level of need that is higher than the level of growth proposed and comprises a significant number of sites that have proven undeliverable through the UDP process -such that there remains a residual requirement from the LDP. In that regard the plan clearly cannot achieve its own vision or objectives.

The Wales Spatial Plan (WSP)

3.3 The aspirations for the South East Region are set out in detail in the WSP, in particular the vision for the area is to create "an innovative skilled area offering a high quality of life - international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and Europe, helping to spread prosperity within the area and benefiting other parts of Wales."

3.4 To adopt a restrictive approach towards housing is fundamentally out of line with the overarching vision for the region and will not contribute towards the achievement of the main priorities identified in the WSP including Promoting a Sustainable Economy.

Local Housing needs

3.5 The LHMA submitted as evidence in support of the plan does not form a reliable source of evidence. It was published in 2007, five years before the LDP was placed on deposit and included assumptions over the deliverability of housing land between 2006 and 2011 that have proven to be an underestimation of actual delivery.

3.6 Page 27 of the LHMA sets out that the number of net additional dwellings required between 2003 and 2021 is 12,100. With 1,210 completed in 2003 to 2006, 3,630 planned between 2006 and 2011 and then a residual requirement of 7620 (726 per annum) over 10 years between 2011 and 2021. I would note that the LDP plans for 151 dwellings less than this per annum and 1510 dwellings less over all during this period.

3.7 Furthermore, it is possible to update the calculations on behalf of the Council. The Residual target as of 2006 was 10,890 from 2006 to 2021. Minus actual completions between 2006 and 2021 (2,561 rather than 3,630 dwellings anticipated in 2007) equates in a residual requirement between 2011 and 2021 of 8,329 dwellings (832.9 dwellings per annum). Again the LDP provision would be 258 less per annum and 2,579 dwellings less than required over the period to 2021.

3.8 If the LHMA requirement to 2021 was extrapolated forward for the plan period to 2026 then it would equate to 12,494 dwellings required over the plan period. This is significantly more than proposed by the Deposit LDP.

3.9 In the absence of any more up to date Housing Market Assessment this clearly forms a significant consideration, insofar as it is plainly the case that the Council's housing supply would not meet the requirements set out in their Local Housing Market Assessment, rather there would be a significant shortfall.

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3.10 The WG "Homes for Wales" white paper indicates that if they are to be effective, LDP's require a robust evidence base and as part of this "Local authorities must assess the need for all types of housing, using up-to-date Local Housing Market Assessments." Whilst this is a consultation paper it is clear that LHMA's contribute towards the evidence base in informing policies and current policies fall short of what is desirable.

Newport Community Strategy

3.11 The Newport Community Strategy sets out the key aspirations for the local community 2010 to 2020. The aim of the strategy is to enhance the quality of life of local communities through actions to improve their economic, social and environmental wellbeing. The Vision is to create a "proud and prosperous city with opportunities for all". This includes objectives related to create a thriving economy, for people to thrive and live in a safe and inclusive economy.

3.12 The approach taken by the Deposit LDP towards housing provision implies that the Community Strategy cannot be achieved. Indeed, the lack of basic provision of housing to meet identified needs can only be considered to be contrary to the fundamental requirements of people and can only harm the implementation of the Community Strategy. As such the LDP can only be considered to be unsound in its current form as it effectively undermines the Community Strategy for the area.

4.1 Social Considerations & Housing Requirements

4.1 The Assembly Government's vision for housing in Wales, Better Homes for

People, is that everyone should have the opportunity to live in good quality, affordable housing; be able to choose where they live; and decide whether buying or renting is best for them and their families.

4.2 In addition to the LHMA, the Local Housing Strategy update (2010) indicates that there are 5,100 households on the waiting list for affordable housing. This level of need equates to significantly more housing (regardless of tenure) than that identified by the LDP.

4.3 The Plan's strategy should be capable of dealing efficiently with a range of circumstances. By not proposing a housing requirement in line with evidence of housing need, the LDP will not be able to deal with the implications of population change, household growth and demand and will not be able to meet the housing needs of its population contrary to Welsh Assembly aspirations and the Deposit LDP Strategy.

4.4 Were the Plan not to provide an adequate level of overall housing provision this would have significant harmful social and economic effects.

4.5 It is a WG objective to tackle social exclusion and to reverse social inequalities. Access to decent housing is at the heart of social inclusion. Under provision of housing through the planning system will undermine this. The greatest impact will fall upon low income households and young people looking to become active in the housing market. Under-provision leads to overcrowding, concealed households and poor quality housing and is contrary to the objectives of the Welsh Government to secure social inclusion.

5.0 Local Economic requirements

5.1 Housing provision forms part of the supporting framework in order to support the Welsh Government's aim to increase employment and local growth. Indeed, the WG Economic Renewal Strategy 2010 sets out the Welsh Government's objectives for helping to shape the future of the Welsh Economy and leading the Country out of recession. The programme sets out a new direction for economic renewal and is based on the understanding that the economy is "simply to dynamic to forecast credibly over the long term". As such the Strategy sets out how the WG (and other levels of Government) can help to "shape the conditions in which a dynamic economy functions, and the role the government and wider public sector can play in encouraging success in the private and third sectors".

5.2 A constrained housing market will have an inflationary impact on land and house prices - which will only exacerbate existing problems. Housing shortages and high prices will limit the ability of labour markets to develop. This will inevitably result in shortages of skilled labour, increasing wage levels and increased long distance commuting. Such problems damage competitiveness, restrict the ability of companies to expand and deter employers from locating in the area and damage employment growth. Jobs will ultimately be lost to other regions in Wales, the UK and to Europe.

5.3 It is imperative that the Plan adopts a robust and positive approach to economic growth (and housing provision) so as to avoid the harmful effects that will occur under the present approach and importantly to avoid a continuation of existing trends that sees young local families unable to compete on the housing market due to the influx of retirees from other parts of the United Kingdom.

6.0 Housing Land Supply

6.1 Allied to our objection to the overall level of housing is our objection to the Council's housing land supply estimate which underpins the allocation of new housing land in Policy H1. Indeed, PPW is explicit that sites should be identified that are land is genuinely available or will become available for development - and importantly sites must be free or readily freed from planning, physical and ownership constraints and economically feasible for development so as to create communities where people want to live.

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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6.2 There are a significant number of sites that the Council envisage will be brought forward in the LDP that were identified within the UDP and remained undeveloped and classified in the latest JHLAS as 3(i). Where constraints exist it is unlikely that such sites will be brought forward in the LDP period as has historically been the case - this is demonstrated in consecutive Joint Housing Land Availability Studies. This emphasises the importance of ensuring a robust supply of land. I highlight several of those sites below:

1. Unimplemented UDP Sites - subject to constraints (flood risk, remediation etc). (including Glebelands, Herbert Road, Whiteheads and Crindau);
2. High density flat schemes - a number of high density flatted schemes have been mothballed in recent years or have under delivered. As such there is little justification for the inclusion of a number of schemes where there is no apparent market interest (including Penmaen Whard, Newport Athletic Club);
3. Overestimation of delivery - I note at L1anwern that based on the trajectory within the agreed Statement of Common Ground for the 2011 JHLAS, it is estimated that it would deliver 2100 dwellings during the plan period, leaving 1900 dwellings outside of the plan period not c.1000 as envisaged by the Council. In addition, it is indicated that Allt Yr Yn will comprise 200 dwellings, however, planning permission on the site was 129 units;
4. S106 sites - there is no evidence presented to suggest that these sites will actually be brought forward.

6.3 It is our view that based on trends over the UDP period, it is highly unlikely that a number of the identified sites will deliver at the levels that Newport envisage. Should the above categorisations be born out then there would be a shortfall of between 3,000 and 4,000 dwellings on the level envisaged as being appropriate by Council i.e. the WG projection plus the flexibility allowance.

Phasing

6.4 At para 2.38 we note that Newport CC indicate that many of their brownfield sites had progressed slowly due to the economic recession between 2009 and 2011. Whereas in actual fact, many of the Brownfield sites remained undeveloped with no interest or unimplemented planning permissions through the peak of the market in the early to mid 2000's and are still categorised in 3(i) of the JHLAS. Indeed, as a sign of the constrained nature of the housing supply in Newport, the peak rate of completions was 714 in 2001 and fell as low as 340 completions in 2004 and 425 in 2005 - as generally in the UK the housing market was moving towards its peak.

6.5 The reliance upon phasing within the UDP was proven to be wholly unreliable and cannot be a basis for carrying forward through the LDP. Indeed, the strategy was rather haphazard - when the UDP required 400 dwellings per annum between 2001 and 2006 they were in fact averaging 508 completions, however, for the final five years the average was significantly below the 740 dwellings required. This resulted in an overarching shortfall of 400 dwellings of the overarching requirement not being provided - this amounts to nearly a years supply of housing not being provided. Clearly this is not acceptable in light of the significant level of housing need identified within the LHMA.

6.6 It is evident that there is no basis for a strategy of phasing in Newport, particularly not when the council should be encouraging high rates of development to meet the unmet requirements of the UDP and the high levels of housing need identified by the LHMA which were also unmet.

Flexibility Allowance

6.7 There should be an element of flexibility in the housing land supply. This is accepted within the Council's existing figures 25% component of any housing land supply estimate to reflect the fact that not all sites with planning permission or allocated in the Plan will be developed either in whole or in part within the Plan period. Planning permissions may lapse and sites may be developed for alternative purposes - as has proven to be the case through the UDP. Such an allowance for non implementation is significantly more important when considering the needs within the area and the number of UDP sites that have remained undeveloped due to constraints.

7.0 Conclusion

7.1 In our submission, and having regard to the requirements of a plan-led system and Planning Policy Wales, the Plan should seek to meet the future accommodation needs of its inhabitants which is essential if the City is to thrive as envisaged by the Community Strategy.

7.2 The implications of such a restrictive approach include lack of private sector investment, exacerbation of housing shortages and failure to achieve the key objectives of the LDP. Rather there should be a strong element of forward thinking in order to produce a sound Plan to ensure that long term issues are addressed and that needs are met in the most sustainable manner. In this context, and having regard to the matters set out herein, adopting a higher growth scenario as a basis for land allocations is essential to produce a sustainable and sound strategy which meets the needs of the County.

8.0 Required Change

8.1 That a housing requirement be set for the County that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. We estimate, based on the available

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indicators, around 12,494 dwellings. In addition to this figure should be added a 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates.

8.2 In light of the identified problems within County in terms of affordability providing to meet estimated housing requirements is essential to ensure an adequate supply of land, retain local families and young people. Constraining supply in these terms would inevitably result in a very unbalanced community profile contrary to the aims and objectives of the LDP.

8.3 Our estimated requirement provision figure for the plan period is 16,100 dwellings. We would hope that the Council will be willing to engage in meaningful discussions with parties such as ourselves to resolve any technical differences over the assumptions used prior to the Examination.

8.4 Accordingly, additional sites must be allocated in order to meet this shortfall. To that extent the land at Glochwen, Rhiwderin is considered acceptable to accommodate some of the required shortfall.

8.5 The supporting Development Framework Document which has been prepared in relation to Glochwen has summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 137 dwellings.

8.6 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP8 - Special Landscape Areas, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

8.7 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at Glochwen within the settlement of Rhiwderin is deliverable. In this regard the allocation at Glochwen will assist in providing certainty over delivery and housing supply within the plan period together with alternative range and choice.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination Due to the significant issues raised in the representations	
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Please refer to the attached representation	
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Item Question

Tick-box reply

6	6	A new policy	Yes
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2072.D4//H01	Newbridge Estates Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	

Additional material submitted

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 295/ Gloch Wen

New Site

Policy: H01

Summary: Request that the land at Gloch Wen is allocated for residential use

Item Question Representation Text

- 2 2 Policy Number
H1 - Housing Sites (Allocations)
- 11 11 Site Name
Land at Glochwen, Rhiwderin

Representation Details

Newport City Council Local Development Plan

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14	14	Representation								
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1.0 Introduction

1.1 Newbridge Estates Ltd objects to the omission of the land Glochwen, Rhiwderin as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:

C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The 8.84ha site is situated immediately adjoining the settlement boundary for Newport at Rhiwderin which is located approximately 5km to the west of Newport City Centre. The site lies to the northwest of Bassaleg, between the A467 and River Ebbw to the north east and the A468 to the south.

2.2 The site comprises a number of fields which are currently used for grazing. To the south the site adjoins the existing residential development at Harlech Drive, whilst to the west it adjoins the recently developed Taylor Wimpey housing site (Gerddi Rhiwderin) and the new allotments. To the north the site adjoins further fields which contain a Scheduled Ancient Monument (SAM) comprising of an earthwork mound marking the location of an Iron Age Fort and to the east the River Ebbw, beyond which lies the former Alcan site.

2.3 Rhiwderin has a community centre, a newsagent, post office, place of worship and a public house all within 500m to the west of the site, along with a children's equipped area of play and allotments at Chapel Terrace. There are also regular bus services close to the site providing links to Newport Bus Station as well as other inter urban bus services to surrounding towns including Caerphilly, Ystrad Mynach, Bargoed and Cardiff.

3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

Housing Requirement

3.2 As detailed within the separate submissions made in relation to Policy H1 → Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated site as well as the requirement to meet local needs as set out within the Local Housing Market Assessment a more appropriate requirement provision figure for the plan period would be 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at Glochwen would actively assist in providing a deliverable housing site to address the identified shortfall.

Settlement Boundary

3.4 As detailed within separate representations made on Policy SP5 -Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Rhiwderin. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

Special Landscape Area

3.5 Within separate representations made in relation to Policy SP8 -Special Landscape Areas it is recommended that the site be removed from the West of Rhiwderin Special Landscape Area and that

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the boundaries be revised given the sites characteristics and suitability for development.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at Glochwen, Rhiwderin.

4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 137 dwellings. It is therefore evident that the development of the site will seek to meet the housing need through the Development Plan period within the sustainable settlement location.

5.0 Required Change

5.1 That the land at Glochwen, Rhiwderin is allocated for housing development within Policy H1 as a new site for 137 dwellings in order to meet the needs of the local community.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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Due to the significant issues raised in the representations

<i>Item Question</i>	<i>Soundness Test</i>	
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness	
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Please refer to the attached representation

<i>Item Question</i>	<i>Tick-box reply</i>
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8	8	Add a new site.	Yes
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2072.D5//SP05	Newbridge Estates Ltd	Boyer Planning	- Cardiff	28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.18

Site: 352/ Gloch Wen

Boundary
Change

Policy: SP05

Summary: To amend the Settlement Boundary to include Gloch Wen

Item Question Representation Text

2 2 Policy Number
SP5- Countryside

9 9 Amend the boundaries of an existing site. Yes

11 11 Site Name
Land at Glochwen, Rhiwderin

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14	14	Representation								
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1.0 Introduction

1.1 Newbridge Estates Ltd objects to the inclusion of land at Glochwen within the Countryside and the omission from within the settlement Boundary of Rhiwderin. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:

C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 –Housing Sites it is noted that whilst Newport are utilising the Welsh Government projections the implications of the Newport City Council Local Housing Market Assessment have not been fully taken into consideration.

2.2 Furthermore, it is outlined that it is inappropriate to rely upon a number of the sites identified within policy H1 to deliver the required housing as they are subject to numerous constraints and have remained undeliverable for some time.

2.3 In considering the above the separate Housing submission recommends that a housing requirement be set that reflects the most accurate position on local needs set out within the Local Housing Market Assessment. This has been estimated at a requirement of around 12,494 dwellings. In addition to this it is recommended that an additional 25% flexibility allowance for non implementation of sites identified with constraints, and a 4% allowance for second/holiday homes and vacancy rates should be added. Consequently this generates an estimated requirement provision figure for the plan period of 16,100 dwellings, well above the 10,900 as proposed within the Deposit Plan.

2.4 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Rhiwderin to incorporate the site at Glochwen would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.5 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.6 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2011 4th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.7 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence

2.8 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.9 The characteristics and location of the site at Glochwen accords with the relevant criteria in order to provide a sustainable settlement extension:

- The site immediately adjoins the settlement boundary of Rhiwderin and is subject to urban influences;
- The extension of the settlement to provide residential development would be wholly compatible with the with neighbouring established land uses;

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- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car, and
- The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available

2.10 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at Glochwen as a housing allocation site and the consequent inclusion within the settlement boundary of Rhiwderin has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.

4.0 Required Change:

4.1 That the site at Glochwen be removed from the Countryside and the settlement boundary for Rhiwderin be amended to include land to the as shown on the attached plan.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination Due to the significant issues raised in the representations	
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness Pelase refer to the attached representation	
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Item Question

Tick-box reply

8	8	Add a new site.	Yes
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2074.D1//H01	Crellin, Mr R T	Burges Soloman		28/05/2012	<input type="checkbox"/>	E	O		M	

Additional material submitted

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 300/ Rock Farm

New Site

Policy: H01

Summary: To include Candidate Site 2074.C1

Item Question Representation Text

2 2 Policy Number

H1

11 11 Site Name

Land at Rock Farm

12 12 Site Reference

2074.C1

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14	14	Representation								
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Please see representation attached .

INTRODUCTION

1.1 This submission has been prepared on behalf of Mr Rowland Crellin. It relates to land contained within Candidate Site 2074.C1 for inclusion in Newport Local Development Plan (2011 - 2026) (the "Plan").

1.2 This document accompanies the required Deposit Representation Form. It details Mr Crellin's objections to the Deposit Plan, on the basis that it does not meet the following tests of soundness:

- 1) CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on robust and credible evidence; and
- 2) CE4: It is reasonably flexible to enable it to deal with changing circumstances.

1.3 This submission provides a description of the site at Section 2; makes representation on the LDP Strategy and Strategic Policies at Section 3; provides a Sustainability Appraisal at Section 4 and provides concluding remarks at Section 5.

2 DESCRIPTION OF THE SITE

2.1 The roughly semi-lunar shaped site is 8.5 hectares and comprises four field blocks. The site used to be part of the quarry and prior to that was a World War 11 prison camp. It is approximately 10 miles east of Newport (20 minute car journey and 30 minute bus journey), approximately half a mile from Penhow village and 1.5 miles from the village of Llanvaches (2-4 minutes by car and within cycling and walking distance). Its grid reference is ST 428 915.

2.2 Adjacent to the site is the Rock and Fountain Public House, several warehouse units employing roughly 35 individuals and the disused Penhow (stone) Quarry. The quarry is almost twice the size of the site and, situated to the west of the site, neatly encloses the site between the quarry, Pike Road and the A48.

2.3 The south end of the site is within 100 metres of the A48. Pike Road runs along the eastern edge of the site and connects the A48 to Llanvaches. There is also an Indian takeaway restaurant adjacent to the public house. Parc Seymour shop is 1.5 miles from the site.

2.4 The main access to the area is via the A48. Roughly 3 miles south of the site, along St Bride's Road, Junction 23A of the M4 can be easily accessed.

3 LDP STRATEGY AND STRATEGIC POLICIES

3.1 The Vision and Objectives and the Local Development Plan that Newport are implementing are, in principle, supported. However, this representation seeks to challenge the Local Development Plan's soundness regarding two specific policies.

3.2 Rock Farm's proposed site is considered to accord with objectives 1 -5 and 7-9:

- (a) Sustainable Use of Land;
- (b) Economic Growth;
- (c) Housing;
- (d) Conservation and the Environment;
- (e) Community facilities and Infrastructure;
- (f) Culture and Accessibility; and
- (g) Health and Wellbeing.

3.3 this proposed site would offer a positive contribution to local communities outside Newport town centre. It will offer an alternative to inner-city living, ensuring an adequate supply and variety of housing, enabling a more diverse population to settle within Newport as a region. The proposed site is large enough to incorporate communal areas and some community facilities that will make this area an attractive and sought after place to live that is easily accessible via existing transport links, and within an easy commute of Newport, Monmouth, Chepstow and Caldicot. This will discourage households from migrating from Newport to Monmouth in search of a more rural environment to live in. This proposed site provides the ideal location to encourage healthy and safe lifestyle choices and

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promote well-being. Several neighbouring villages with shops and existing community facilities are within walking or cycling distance. The existing local pub and takeaway would also benefit and provide a community atmosphere to the inhabitants of the proposed site.

Policy H1 - Housing Sites:

3.4 This Policy is considered unsound on the following key grounds:

- 1) There has been insufficient assessment of the housing needs across all parts of the Newport plan area, which has resulted in proposed new site allocations being clustered in and around Newport City without consideration of whether need and demand exists in the rural areas of the County Borough; and
- 2) it has failed to allocate Candidate Site 2074.C1

'Networked' city

3.5 The Wales Spatial Plan Update 2008 states that South East Wales needs to function as a 'networked' city. The borough of Newport is 70 per cent rural and as such, some networks need to be developed into the more rural communities from the City of Newport itself; this should comprise transport and housing elements. The present allocation of sites under the Local Development Plan comprises 105 hectares of almost exclusively Brownfield, central sites which will result in housing being squeezed into the centre of Newport and the City becoming more compact.

3.6 The regional transport plan being developed by the South East Wales Transport Alliance will further help the 'networked' city concept and ensure that the proposed site only becomes better connected with other areas of South East Wales in time. This will promote its sustainability and add to its viability as a real substantial alternative to city and urban living.

Lack of rural assessment

3.7 Paragraph 9.1.4 of Planning Policy Wales ("PPW") states that Development Plan policies should be based on an up-to-date assessment of the full range of housing requirements across the entire plan area and over the plan period. This is reflected in TAN 2 at paragraph 8.1. The present Local Development Plan entirely fails to achieve this as it does not assess pockets of need or demand in smaller areas and instead focuses all allocations within the periphery of the City.

3.8 The proposed site represents an opportunity to secure an element of rural affordable housing. There is a genuine local need visible by the fact that households are migrating out of Newport and into Monmouthshire. The proposed site would help stop this from happening by meeting this need.

3.9 TAN 2 (2010) states that planning authorities should approach affordable housing need in an innovative way to maximise its supply. Newport is primarily made up of rural landscape, it would therefore seem logical to make some provision for market and affordable housing in the rural areas. This will discourage polarisation of the rural communities and cities.

3.10 At present there is no support for the rural economy due to a failure to assess local rural needs outside Newport City boundary. There has been an evident presumption, based on sustainability issues, that all housing need and demand should be focused into the City. However, from the sustainability assessment of the proposed site, (see Section 4 for details) it can be seen that in sustainability terms the site is comparable to other Brownfield sites that have been allocated within the Local Development Plan.

3.11 One significant reason that the proposed site failed to achieve a more accurate assessment of its sustainability is likely to be because it has been categorised into a group with another site. The other site location (South View, L1anvaches) has different immediate surroundings and proximity to amenities and is being proposed as an open space site; the result being that the proposed site at Rock Farm achieves an artificially low score compared to when the site is considered in isolation. This has been addressed through the Sustainability Appraisal in section 4.

3.12 Paragraph 10.12 of T AN2 states that there must be adequate housing provision in rural areas to meet the needs of local people and contribute to the delivery of sustainable communities, however, the Local Development Plan does not identify rural housing need or clearly set out how it will contribute to meeting any identification of such. Furthermore paragraph 10.15 states that assessments need to be undertaken at ward or village level. There is a lack of evidence to support the fact that this has happened despite Welsh national policy stipulating that a full range of housing requirements across the whole plan area over the plan period should be assessed.

3.13 In recognition of its rural location the design of any development would recognise distinctive elements of living outside a settlement boundary. The preservation of existing boundary hedgerows with the additional planting of native species, and provision of open spaces within the development would enable some aspects of the original site to be retained. The location of the site adjacent to the quarry and the A48 would minimise landscape impacts and visual intrusion from the development of this site. It has the potential to support local businesses and create opportunities for diversification within the local economy by providing a much needed opportunity to ensure that workers are locally available, improve local facilities, particularly leisure and other activities as part of the overall

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development offering										

3.14 This site is not located within one of the identified Green Wedges or Green Belts so would have no adverse impact on SP6 and SP7 - Green Belt and Green Wedges.

Lifestyle choices

3.15 The lack of provision for rural dwellings will have obvious and very real effects on lifestyle choices of individuals and subsequently the wider population as a whole.

3.16 Steeped in the heart of Welsh Policy is the ambition to build a rich cultural and healthy environment for residents and tourists alike to enjoy. The Wales Spatial Plan recognises the important role that Key Settlements will play in ensuring that sustainable communities promote Newport as a whole rather than as a City alone. Chepstow is one of the Key Settlements that has been identified; this is 20 minutes by car and 30 minutes by bus from the proposed site. It offers a plethora of learning and employment opportunities to its inhabitants. These resources could be tapped into by inhabitants of the proposed site. The South East Wales Transport Alliance should no doubt improve this already easy access to this integral town in South Wales.

3.17 The ultimate developers of the proposed site at Rock Farm would consider closely the Countryside Council for Wales' objectives and ensure that any development on the site was sympathetic to the surroundings. Its location is ideal for marrying a healthy life in the countryside with a prosperous and fulfilled educational and employment career; all key contributors to a healthy and sustainable population.

Policy SP1 0 - House Building Requirement:

3.18 This policy is considered unsound on the basis that provision for housing development outside settlement boundaries should be possible where conditions are imposed. The Welsh Spatial Plan states that the projected population and household growth in Newport is significant (WSP paragraph 19.15) and that Newport is the economic gateway to Wales (WSP paragraph 19.11). The Housing Forecasts Background Paper states that 'expansion to the east of the city, together with the significant regeneration potential of previously developed land within the city, affords Newport the opportunity to contribute to wider needs within the region as a whole and the Newport economy in particular. Increased housing provision will have the potential to sustain the planned investment in the city centre, enhancing the offer available to those who live or work in the city' (paragraph 2. 16).

3.19 As previously noted, there has been insufficient assessment of the local housing needs in more rural areas of Newport. It is therefore questionable whether the plan allocates housing in the right locations. The current allocations proposed allocations seem to be focused within the Newport City region and not further afield resulting in areas such as Pen how being given no opportunity for future housing provisions.

3.20 Presently, there is only one rural site in the North East quadrant of Newport currently not rejected by the Local Development Plan, which sits just to the north of the M4 and to the east of the A449 (Candidate Site 250.C1, L1anwern, Underwood). This provides for a residential mixed use site, in total 156.84 hectares of Greenfield land. It is not clear how this one development could address the needs of this part of the region (the NE quadrant). The proposed Rock Farm site would help address the needs in this area and add diversity to the current Local Development Plan and provide an alternative to inner city living.

3.21 The proposed Rock Farm site would also be capable of bridging the divide between the proposed Newport development sites and Monmouth, Chepstow and Caldicot development sites. The Local Housing Market Assessment 2006 (2010 update) ("LHMA") shows that Monmouth has experienced a net in-migration of 220 people in 2008, some of whom have come from Newport. If the proposed site was admitted to the Local Development Plan this may encourage some households to stay within the Newport boundary, even if they decided that they wish to pursue job opportunities in Monmouth or the other surrounding regions

3.22 Completions within the Newport region are currently 56% of the number that they were in the third quarter of 2006. Because of the global economic recession many of the developments accepted into the UDP have stalled, there is still a decreased level of construction compared to several years ago and possibly a reluctance or inability to progress these projects towards completion. It is also indicative of a failure of existing developments to meet the actual demands and requirements of local people.

3.23 The proposed site is a sustainable alternative to large inner city redevelopment of Brownfield sites in the way of a smaller, local development, providing a unique housing opportunity which would be a welcome stimulant to the housing market.

3.24 At paragraph 22 of the LHMA it states that there is currently a net housing need for 1, 2 and 4 bedroom dwellings in market housing in Newport. This should not be met exclusively by single

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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strategic sites in Newport's more urban areas, but instead be met by diverse housing availability particularly in relation to larger 4 bedroom family homes. The proposed Rock Farm site is immediately available for delivery and does not have the complications that are likely to arise from the use of other previously developed sites, for example the land would not need extensive de-contamination, as may be the case for the Steel works site to the East of Newport centre, so a development timescale can be more confidently assessed.

3.25 The LHMA also identified that increasing numbers of households are being priced out of the owner occupied market in Newport. In the eight years from 1999 the average property price rose by 165% in Newport. The proposed site is large enough to have a significant number of affordable housing dwellings (at least 30% of the total housing built) that would help combat the current need for more affordable housing within the region.

3.26 The Joint Housing Land Availability Study ("JHLAS") (produced in May 2011) states that the number of completions in Newport were below the UDP requirement. Furthermore despite the build rate suggesting that there is a 6.4 year supply of land, the land supply, when set against the current UDP, actually only equates to 3.5 years. Paragraph 9.2.3 of Planning Policy Wales (as amended) states that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of housing. To become genuinely available, sites must satisfy various minimum criteria set out in TAN 1 (2006); the necessary infrastructure should be available or be expected to be available within the 5-year period and it is agreed as financially viable to develop.

3.27 TAN 1 (2006), at paragraph 5, also states that where the JHLAS shows a land supply below the 5 year requirement, 'the need to increase supply should be given considerable weight. It is questionable whether a 5 year supply truly exists for the Newport area as a result of the draft plan. It is certainly not clear that the longer term housing supply over a 15 year period has been assessed to justify the projected figures up to 2026.

3.28 In order to make Policy H1 sound Candidate Site 2074.C1 should be included within it.

Policy SP2 - Health:

3.29 This Policy would be adhered to and indeed be encouraged by the proposed site as it would allow households to experience a rural environment on a daily basis. This would be likely to promote health and well-being as it would encourage inhabitants to explore their local surroundings on foot and embrace countryside living. There has been some limited work on the connection between overcrowding and mental health reported in the Journal of Environmental Health Research (Volume 1; Issue 1: Poor Housing and Mental Health in the United Kingdom: Changing the Focus for Intervention, dated 2002), which suggest a correlation between depression psychological symptoms with overcrowding within a community. (Appendix 1). The ODPM have also undertaken research and published their findings. This document, The Impact of Overcrowding on Health and Education: A review of the Evidence and Literature also notes limited evidenced links between overcrowding and poor physical and mental health in children and adults (Housing Research Summary Publication. Issue 210, 2004). (Appendix 2). Using Brownfield sites almost exclusively in the Local Development Plan will only serve to increase the density of the population, and the potential for overcrowding, within Newport.

3.30 H3 - Housing Mix and Density: The proposed site would add real value and measurable results to this Policy. The proposed site is large enough to accommodate some community facilities in addition to various dwelling sizes and types. This proposed site provides a valuable alternative to inner-city living. Surrounding the proposed site there is already a public house, several warehouse and an Indian take-away restaurant and a disused quarry. The development of the proposed site would provide housing for individuals working at any of these establishments as well as in the land area. Its size and location means that it can accommodate a range of areas in addition to housing, such as retail, leisure and, probably, live work units.

3.31 The Local Housing Strategy Consultation Responses 2011 show that helping first time buyers purchase on the open market and making opportunities for people to rent and then buy their homes features highly amongst the population's priorities. The proposed site would contribute towards achieving these objectives.

3.32 As noted above, at paragraph 3.3, there is some evidence to suggest that overcrowding contributes or worsens mental health problems. By creating new sustainable pockets of housing rather than infilling on brownfield sites, this small but significant correlation between overcrowding and mental health may be minimised.

Please see section 4 of representation attached

SUSTAINABILITY APPRAISAL

4.1 As previously noted at paragraph 3.10 the Council's sustainability appraisal considered the proposed site at Rock Farm in conjunction with another other site that is arguably less sustainable than the

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Rock Farm site. This resulted in the Rock Farm site sustainability figures being artificially suppressed. Taken in isolation the following assessment is believed to be a more accurate reflection of the site.

4.2 The Council's assessment has been revised to focus on the merits of the Candidate Site 2074.C1 at Rock Farm. The table below shows the Council's assessment and our assessment, where there is agreement, this is acknowledged, where there is a difference of opinion reasons are provided.

4.3 Previously the proposed site scored: It now scores:

- (a) Red: - - 5
- (b) Orange: 1- 12
- (c) Green: 1- 19
- (d) Black and White: - 4
- (e) Questionable: - 2

4.4 As a result of this assessment the proposed site scores considerably more favourably and is comparable with some sites which have emerged as housing land allocation.

4.5 The proposed site would also be compatible with wider regional and national policy as it would facilitate individuals to lead healthier lifestyles in rural areas, without impinging on Green Belt land or significantly changing the landscape of the surrounding area.

5 CONCLUSION

5.1 This representation has been prepared on behalf of Mr Rowland Crellin. It relates to land being promoted for development at Rock Farm, Penhow, adjacent to the disused Stone Quarry, several warehouse units and the Rock & Fountain Public House. The 8.5 hectare site is situated just north of the A48 and to the west of Pike Road.

5.2 Mr Crellin's main objection to the Local Development Plan relates to Policies H1 and SP10. There is insufficient land allocation and housing planned across the whole county Borough area and the concentration of development sites being around the centre of Newport and to the east and west of Newport results in the housing allocation not being diverse enough. As a result, it will increasingly be difficult to meet the needs of all households. This may result in a sustained net migration out of Newport.

5.3 Newport has been recognised as the economic gateway to Wales and population and household numbers are expected to rise. Sufficient dwellings across the whole plan area therefore need to be provided. This is not currently provided for in the Local Development Plan, which fails to assess specific areas of local need or provide for a diverse range of housing locations.

5.4 The proposed site at Rock Farm would be an ideal location to allocate housing and to ensure that there is some provision made for affordable/rural housing in this area of Newport and to meet local needs. It has an existing transport system that could be easily modified to accommodate the increased usage and almost half the site is already surrounded by development to some degree, thereby allowing the development to be accommodated without significantly adversely impacting the wider rural surroundings.

5.5 It has been demonstrated that the proposed site is compatible with achieving the Sustainability Appraisal objectives.

5.6 It is respectfully submitted therefore that the failure to allocate Rock Farm Candidate Site 2074.C1 within Policy H1 is unsound and in order to make Policy H1 sound Rock Farm Candidate Site 2074.C1 should be included.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	No
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	No
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Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness CE2 & CE4									
	<i>Item Question</i>									
8 8	Add a new site.									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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2125.D11//H01	Spence, Mr Hugh	C Architecture		28/05/2012	<input type="checkbox"/>	E	O		M	
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Additional material submitted

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 301/ The Cayo

New Site

Policy: H01

Map: Inset 13: Llanvaches Village Boundary

Summary: Please include housing development at Llanvaches

Item Question Representation Text

11 11 Site Name
The Cayo (Postcode = NP26 3AY)

12 12 Site Reference
Site address as above

14 14 Representation

Please refer to the following separate documents in support of the application to add a new site (alternative site) :-

- Supporting Statement - Including Site Plan in the Appendix. (Written by Malcolm Scott Constants - Dated 24 May 2012)
- Sustainability Assessment - Includes copy of Candidates Site application form in the Appendix (Written by Malcolm Scott Constants - Dated 28 October 2010).
- Flood Risk Assessment (Written by Simon Dent Associates - Dated May 2012).

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination

In particular we would like to speak about the Council's move away from spatial village expansion. We understand the Council has opted for a 'brownfield' only approach, but this is at the expense of the sustainability of villages in the Borough. We would also like to discuss the consideration which has been given to our client's site during the plan preparation, as this appears to have been negligible. We would like to discuss the suitability of Llanvaches and naturally the deliverability of our client's site, and the potential benefits which development of the site could offer the village. We consider speaking at the hearing will help the Inspector understand these issues.

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness

We consider the Deposit Plan is not sound as:

- No village development is proposed, which has the potential to stagnate rural communities;
 - The plan moves away from the Preferred Strategy without clear explanation;
 - The methodology in the background papers is erroneous because the Wales Spatial Plan promotes rural development; the Council's Preferred Strategy accepted that village expansion could be appropriate; and Atkins' ISAR regarded village expansion as sustainable; and
 - Our client's site does not appear to have been given proper consideration in the preparation of the emerging plan.
- Please see supporting statement

Representation Details

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2126.D1//CF09	Padfield, Mr D	Derek Prosser Associates		29/05/2012	<input type="checkbox"/>	P	O		M	

Document:Deposit Plan, p.105

Policy: CF09

Summary: Need for the plan to consider policies for wider range of tourism/leisure proposals especially within a rural location

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number CF9/CF12 (related)	
3	3	Paragraph or section number(s) 5.35-5.45	
7	7	A new paragraph or new text.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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The Plan is considered unsound because it does not include a policy or policies to deal with a wider range of tourism/leisure proposals, particularly those with the requirement for a rural location.

The emphasis in policies CF9 and CF12 is either on urban regeneration proposals or expressed in the negative with the likelihood that appropriate rural leisure activities will be discouraged.

The Plan fails to take up the advice of Planning Policy Wales, Edition 4, published in February 2011, which suggests that the planning system should encourage sustainable tourism recognising the needs of visitors and those of local communities.

Assembly Government advice is positive stating:-

"In the rural areas, tourism related developments is an essential in providing for a healthy, diverse, local and national economy. It can contribute to the provision and maintenance of facilities for local communities. Here too development should be sympathetic in nature and scale to the local environment and to the needs of visitors and local community."

The suggestion is that "the development plan should encourage the diversification of farm enterprises and other parts of the rural economy for appropriate tourism, sport, recreation and leisure uses subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value."

This is a positive suggestion which has been disregarded in the Deposit Plan. The way the Plan policies have been drafted gives a strong negative emphasis to such proposals to the detriment of opportunities which can bring real benefits to tourism in Newport and its wider rural hinterland.

Policy CF10 refers to tourism/leisure opportunities at Celtic Manor, giving this urban edge resort a virtual monopoly of future such developments. It is acknowledged this is a sensitive location with a prominent semi-rural location. The policy allows for further expansion, yet there are no policies to encourage the development of other tourism/leisure facilities in less sensitive locations at much smaller scale.

It is therefore suggested that an additional tourism/leisure policy included in the Plan to reflect Assembly Government aspirations. This might state:-

"The Plan will encourage the diversification of farm enterprises and other parts of the rural economy with the development of appropriate tourism, sport, recreation and leisure uses subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity. In addition to the criteria above, the local planning authority will have particular regard for the location, relationship with neighbouring land uses and accessibility."

The explanatory paragraph might usefully indicate the range of developments considered appropriate such as the various types of self-catering accommodation which would include log cabins, chalets and caravans. These provide for the needs of families who out of choice or availability of income, wish to visit the area to enjoy its history, local features, attractions and amenities yet would wish to travel by car and not rely on urban hotel or similar accommodation. It is a popular form of tourism and should not be ignored as an opportunity to increase the number of tourists visiting the area.

15	15	Do you want to speak at Public Examination?								
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No

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness
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C1, C2, C3, CE1, CE2, CE4.

<i>Item</i>	<i>Question</i>
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Tick-box reply

6	6	A new policy
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2126.D2/2.35-2.39/	Padfield, Mr D	Derek Prosser Associates		28/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: MS

Document: Deposit Plan, para.2.35-2.39

Site: 302/ Greenmeadow Farm

New Site

Policy: SP10

Map: Inset 14: Parc Seymour Village Boundary

Summary: Policy SP10 objection plus new candidate site at Parc Seymour

Item Question Representation Text

2 2 Policy Number

SP 10 (H1)

3 3 Paragraph or section number(s)

Paras 2.35 - 2.39

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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On behalf of my Client, Mr David Padfield, the owner of the land identified on the attached plan, I wish to point out that Deposit Local Development Plan is unsound and needs to be changed.

The first of the Assembly Government's objectives for housing is:-
"to provide more housing of the right type and offer more choice."

Furthermore, the Assembly Government will seek to ensure that:-

"the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains, and, where possible enhances important landscape and wildlife features in development."

As openly indicated in the Deposit Plan, the supply of housing is focused on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permission for many years and seem no nearer to be developed now. There appears to be a complacent attitude that few more sites need to be allocated, even though the end date for the Plan is 2026. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

Also, national government emphasises the need to make up the shortfall in affordable housing provision. The dependence on brownfields sites, where development costs are higher, is in danger of not producing the required affordable housing provision because of the threat to the viability of development.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites. It accepts that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Deposit Plan provides for its housing sites to be totally concentrated within the urban boundaries of the City with no opportunities beyond the urban boundaries. In particular there are no new allocations proposed to the east of The Coldra, with an extensive rural area which requires new development opportunity to sustain itself and the few rural facilities.

The last published Joint Land Availability Study shows the City to have land available to provide a 3.5 year land supply when set against the UDP requirements. This will not have sustainability improved with permissions granted since, when the next study is published shortly. It is suggested that, compared with the past 5 year build rates, the land supply equates to 6.4 years but the build rates were constrained by insufficient range of sites available for early development, depending so much on regeneration of brownfield sites. The Council's current Deposit Plan strategy is likely to suffer the same problems.

The Study showed that only 23.8% of the dwelling units were likely to be built within 5 years whereas over 73% would not become available until after the first 5 years.

National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. The Deposit Plan does little to address the short term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above- mentioned deficiencies. One such allocation would be that identifies on the attached plan. It would form a logical and integrated western extension to the established Parc Seymour development and would help to sustain and grow the limited village facilities. The Codra Roundabout has had major improvements to improve its capacity and further development at Parc Seymour will enhance the City's housing supply. There is and always has been a high demand for housing there and there are good public transport links to Newport.

While the land is largely open fields and hedgerows, its important landscape and ecological features can be retained and enhanced in the development. Its allocation has the prospect of bringing forward early affordable housing provision and could accommodate local services and facilities as required.

National Government suggest a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the planning process to allow a faster lead-in time to development. The Deposit LSP proposals do little to provide a range of housing sites offering choice, variety and quality in the short term and flexibility to deal with changes in circumstances. This site fronting the A48 will enhance the housing allocations and the development opportunity in Newport during the Plan period.

Additional Information Submitted - Available on Request

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		No							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness CE1, CE2, CE4. C1, C2, C3.									
<i>Item Question</i>										
8 8	Add a new site.		Yes							

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2126.D3/5.35/CF1	Padfield, Mr D	Derek Prosser Associates		29/05/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.106, para.5.35

Policy: CF12

Summary: Need for the plan to consider policies for wider range of tourism/leisure proposals especially within a rural location

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number CF9/CF12 (Related)	
3	3	Paragraph or section number(s) 5.35-5.45	
7	7	A new paragraph or new text.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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The Plan is considered unsound because it does not include a policy or policies to deal with a wider range of tourism/leisure proposals, particularly those with the requirement for a rural location.

The emphasis in policies CF9 and CF12 is either on urban regeneration proposals or expressed in the negative with the likelihood that appropriate rural leisure activities will be discouraged.

The Plan fails to take up the advice of Planning Policy Wales, Edition 4, published in February 2011, which suggests that the planning system should encourage sustainable tourism recognising the needs of visitors and those of local communities.

Assembly Government advice is positive stating:-

"In the rural areas, tourism related developments is an essential in providing for a healthy, diverse, local and national economy. It can contribute to the provision and maintenance of facilities for local communities. Here too development should be sympathetic in nature and scale to the local environment and to the needs of visitors and local community."

The suggestion is that "the development plan should encourage the diversification of farm enterprises and other parts of the rural economy for appropriate tourism, sport, recreation and leisure uses subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value."

This is a positive suggestion which has been disregarded in the Deposit Plan. The way the Plan policies have been drafted gives a strong negative emphasis to such proposals to the detriment of opportunities which can bring real benefits to tourism in Newport and its wider rural hinterland.

Policy CF10 refers to tourism/leisure opportunities at Celtic Manor, giving this urban edge resort a virtual monopoly of future such developments. It is acknowledged this is a sensitive location with a prominent semi-rural location. The policy allows for further expansion, yet there are no policies to encourage the development of other tourism/leisure facilities in less sensitive locations at much smaller scale.

It is therefore suggested that an additional tourism/leisure policy included in the Plan to reflect Assembly Government aspirations. This might state:-

"The Plan will encourage the diversification of farm enterprises and other parts of the rural economy with the development of appropriate tourism, sport, recreation and leisure uses subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity. In addition to the criteria above, the local planning authority will have particular regard for the location, relationship with neighbouring land uses and accessibility."

The explanatory paragraph might usefully indicate the range of developments considered appropriate such as the various types of self-catering accommodation which would include log cabins, chalets and caravans. These provide for the needs of families who out of choice or availability of income, wish to visit the area to enjoy its history, local features, attractions and amenities yet would wish to travel by car and not rely on urban hotel or similar accommodation. It is a popular form of tourism and should not be ignored as an opportunity to increase the number of tourists visiting the area.

15	15	Do you want to speak at Public Examination?								
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No

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>								
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1	1	I think the LDP is sound.								
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No

13	13	Test of Soundness								
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C1,C2,C3,CE1,CE2,CE4

<i>Item</i>	<i>Question</i>									
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Tick-box reply

6	6	A new policy								
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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2145.D1//H01	Ballinger, Miss E			29/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.62

Site: 317/ Church Farm

New Site

Policy: H01

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: Allocate land at Church Farm (Large Site) for development.

Item Question Representation Text

4 4	The Proposals Map West of City - Marshfield	Yes
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9 9	Amend the boundaries of an existing site. Sites 2050 C1 / 2050 C2 and 1525.C3	Yes
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11 11	Site Name Church Farm and Colinda	
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12 12	Site Reference (2050 C1/ 2050 C2 - 1525.C3)	
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14 14	Representation	
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It would appear from the proposals within the Unitary Development Plan that there is an imbalance in the focus relating to 'Inner City Regeneration' and an insufficient community development structure for outlying villages particularly to the west of the City. In particular Marshfield could benefit from some forward thinking planning vision not only to improve the aesthetic outlook of the Village but also to enhance the quality village life.

It is therefore suggested that by incorporating facilities of a Health Centre (called for in Public Consultation meeting 14th May2012), and developing 'A MODEL VILLAGE CONCEPT' of superior mixed use housing/amenities plan incorporating land between Marshfield Road and through to Marshfield Church would link the residents of the various housing estates that have been evolved during recent decades in Marshfield Village to recreate what was in previous Centuries the hub of the community. This would incorporate land within Sites identified in – 1525.C3-2050.C1 (for land to West of Church Farm House and Yard. – and access through 2050.C1. (where there is already a Public Footpath through to the Church and beyond).

At the same time it is proposed that Marshfield School be provided with enhanced facilities by way of incorporating land at the rear of the existing site specifically for educational use and to include 'reduced risk' traffic management and improved sports facilities.

The cost for acquiring land for the extension of the school could be met by the use/sale of proposed Site Council Estates Department Site 1525.C5

I am a resident - do not have the resources of your investigatory unitary planning team and therefore there are no attachments but believe these proposals to be a valid improvement to the community.

15 15	Do you want to speak at Public Examination?	No
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Item Question Soundness Test

1 1	I think the LDP is sound.	No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness									
<p>It would appear from the proposals within the Unitary Development Plan that there is an imbalance in the focus relating to 'Inner City Regeneration' and an insufficient community development structure for outlying villages particularly to the west of the City (Marshfield).</p>										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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2145.D2//H01	Ballinger, Miss E			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.62

Site: 321/ Church Farm

New Site

Policy: H01

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: To allocate Candidate Site 2050.C2 - land at Church Farm (Small Site)

Item Question Representation Text

4 4 The Proposals Map
West of City - Marshfield

9 9 Amend the boundaries of an existing site.
(Sites 2050 C1/2050 C2 - 1525.C3)

11 11 Site Name
Church Farm and Colinda

12 12 Site Reference
(2050 C1 / 2050 C2 - 1525.C3)

14 14 Representation

It would appear from the proposals within the Unitary Development Plan that there is an imbalance in the focus relating to 'Inner City Regeneration' and an insufficient community development structure for outlying villages particularly to the west of the City. In particular Marshfield could benefit from some forward thinking planning vision not only to improve the aesthetic outlook of the Village but also to enhance the quality village life.

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At the same time it is proposed that Marshfield School be provided with enhanced facilities by way of incorporating land at the rear of the existing site specifically for educational use and to include 'reduced risk' traffic management and improved sports facilities.

The cost for acquiring land for the extension of the school could be met by the use/sale of proposed Site Council Estates Department Site 1525.C5

I am a resident - do not have the resources of your investigatory unitary planning team and therefore there are no attachments but believe these proposals to be a valid improvement to the community.

15 15	Do you want to speak at Public Examination?	No
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Item Question Soundness Test

1 1	I think the LDP is sound.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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13	13	Test of Soundness								
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It would appear from the proposals within the Unitary Development Plan that there is an imbalance in the focus relating to 'Inner City Regeneration' and an insufficient community development structure for outlying villages particularly to the West of the City (Marshfield).

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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2145.D3//H01	Ballinger, Miss E			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.62

Site: 322/ Colinda

New Site

Policy: H01

Summary: To allocate Candidate Site 2050.C1 - Colinda, Marshfield.

Item	Question	Representation Text
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4	4	The Proposals Map West of City - Marshfield
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9	9	Amend the boundaries of an existing site. (Sites 2050 C1/2050C2 - 1525.C3)
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11	11	Site Name Church Farm and Colinda
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12	12	Site Reference (2050 C1 / 2050C2 - 1525.C3)
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14	14	Representation
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It would appear from the proposals within the Unitary Development Plan that there is an imbalance in the focus relating to 'Inner City Regeneration' and an insufficient community development structure for outlying villages particularly to the west of the City. In particular Marshfield could benefit from some forward thinking planning vision not only to improve the aesthetic outlook of the Village but also to enhance the quality village life.

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I am a resident - do not have the resources of your investigatory unitary planning team and therefore there are no attachments but believe these proposals to be a valid improvement to the community.

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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13 13 Test of Soundness

It would appear from the proposals within the Unitary Development Plan that there is an imbalance in the focus relating to 'Inner City Regeneration' and an insufficient community development structure for outlying villages particularly to the West of the City (Marshfield)

2184.D1//W1	SINC (Stop Newport & Monmouthshire Incinerator Ca			25/06/2012	<input type="checkbox"/>	E	O		M	
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Council Officer: MS

Document: Deposit Plan, p.113

Policy: W1

Summary: Objection to proposed location of waste sites and perceived favour of incinerator

Item Question Representation Text

14 14 Representation

I am writing on behalf of the Stop Newport and Monmouthshire Incinerator Campaign to object to the provisions covering waste in the deposit version of the Local Development Plan.
General Comments

Chapter 11 of the Deposit LDP amounts to an "Incinerator's Charter". It has clearly been written in full knowledge of the detailed Veolia application, in an attempt to move the goal posts retrospectively and provide justification for the application in the LDP. We entirely reject the assertion by officers made at Nash last week and elsewhere that the plan is "technology neutral".

The text which supports Prosiect Gwyrdd was written in full knowledge that this offers only a choice between 2 different incinerators. It is unacceptable that references to PG are included, whilst the draft deliberately omits any mention of the agreed Newport Council Waste Management Strategy (NWMS - 2004) agreed democratically by Councillors and STILL IN FORCE.

The NWMS should be the Plan's benchmark. It does not favour incineration, and specifically supports Mechanical and Biological Treatment. Council officers should be identifying sites for an MBT plant in line with the NWMS, and not for an incinerator.

The 2004 Strategy cannot be replaced via a late chapter to the LDP (and an even later background paper) which have clearly been drafted by officers to support PG and incineration without any open debate with Councillors or the public.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2184.D2//W1	SINC (Stop Newport & Monmouthshire Incinerator Ca			25/06/2012	<input type="checkbox"/>	E	O		M	

Council Officer: MS

Document: Deposit Plan, p.113

Site: 424/ South of Llanwern Steelworks

Delete Site

Policy: W1

Summary: Objection to provision of Llanwern Waste Facility

Item Question Representation Text

14 14 Representation

Objection to Provision for Regional Llanwern Waste Facility

The most damaging and specific suggestion is the proposal numbered W1 (page 113) that "LAND IS ALLOCATED FOR REGIONALLY SCALED WASTE MANAGEMENT FACILITIES ON LAND SOUTH OF LLANWERN STEELWORKS" (4ha). Although it deliberately tries to conceal its intention (from Councillors and the public) by failing to use the word "Incinerator" and even failing to use the usual euphemism of "Energy from Waste", this proposal is designed to provide full endorsement in the LDP Deposit approved by Councillors to cover Veolia's application for a regional waste incinerator on this specific site.

The fact that proves beyond doubt that the LDP is not "technology neutral" is that this allocation of the site at Llanwern is a new and recent proposal – there was no mention of it in the original LDP draft submitted for public comments in Jan 2010 as the council's "Preferred Strategy". Like all other Newport CC plans until now, the 2010 draft did not remotely envisage the construction of a gigantic mass-burn waste incinerator just down the road from the Glan LLyn regeneration site, where show homes are already built, and where schools, a health centre and recreational facilities will be constructed later. In fact the 2010 LDP draft went further still: it specifically stated that "The waste site allocated under Policy WD2 of the Adopted Unitary Development Plan on land south of Llanwern Steelworks (i.e. Bowleaze Common) is no longer needed for [steelworks] waste disposal purposes. The site designation will therefore be removed". In other words, even the historic and declining use of the Bowleaze Common site for steel waste was regarded by the planning authority as unnecessary as recently as January 2010.

What Happened between the February and March Council meetings?

It is interesting to discover that several paragraphs of direct pertinence to Veolia's application were introduced to the text between the original draft submitted to the Council in February 2012 (but hastily withdrawn after SNIC's protests) and the final version approved for deposit on 27 March 2012. No attempt was made to explain these expansions and changes to Chapter 11. In our view they were concocted to align the plan more closely with Veolia's application and above all to provide a basis for the Council to counter objections which had already been made by a number of organisations, including SNIC.

These amendments were inserted in spite of the fact that the application was known to be highly controversial and had not been approved by Councillors. This was an entirely inappropriate way to behave given the Veolia's application was already on the table. It may also have been an unlawful course of action and we reserve our right to challenge the legality of actions in Feb-March 2012, particularly if it subsequently transpires that the text in the LDP as it stands is being used to support Veolia's planning application in any way and at any stage.

If Officers were truly neutral the draft could simply have said "no reference will be made in this plan to the proposals for an incinerator at Llanwern until the current planning application has been determined". The plan could then have been adjusted in the light of the decision on Veolia's application. Officers have constantly claimed that the application will be decided against the criteria in the existing Unitary Development plan, so officers should have acted on their promises by ensuring that the draft LDP did not attempt to move the goal posts while an application was being considered.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2184.D3/11.17-8/W	SINC (Stop Newport & Monmouthshire Incinerator Ca			25/06/2012	<input type="checkbox"/>				M	
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Council Officer: MS

Document:Deposit Plan, p.114, para.11.17-8

Policy: W2

Summary: Paragraphs come close to suggesting that waste incinerators are acceptable in any industrial site

Item Question Representation Text

14 14 Representation

1. W2 and Paragraph 11.17-8 come close to saying that waste incinerators would be acceptable to NCC officers on ANY industrial site in the City

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2184.D4/W1	SINC (Stop Newport & Monmouthshire Incinerator Ca			25/06/2012	<input type="checkbox"/>	E			M	
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Council Officer: MS

Document:Deposit Plan, p.113

Policy: W1

Summary: Chapter 11 lack of information on climate change

Item Question Representation Text

14 14 Representation

2. Chapter 11 has nothing at all to say on climate change despite the fact that the substantial greenhouse gas emissions from incinerators will be counted alongside other emissions under EU rules

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2184.D5//W1	SINC (Stop Newport & Monmouthshire Incinerator Ca			25/06/2012	<input type="checkbox"/>	E			M	

Council Officer: MS

Document: Deposit Plan, p.113

Policy: W1

Summary: Concern that an incinerator design is seen as more important than their toxic emissions

Item Question Representation Text

14 14 Representation

3. At times, the Plan's authors actually seem to think that the outward appearance of waste incinerators is more important than the effect of their toxic emissions and ash on our people and the environment. They seem totally unaware of the EU legislation on air quality and particles. which they have a legal duty to implement (this applies to the entire Plan which has very little to say about air quality at all).

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2184.D6//W1	SINC (Stop Newport & Monmouthshire Incinerator Ca			25/06/2012	<input type="checkbox"/>	E			M	

Council Officer: MS

Document: Deposit Plan, p.113

Policy: W1

Summary: Inconsistency between Chapter 11 and the rest of the plan

Item Question Representation Text

14 14 Representation

Inconsistency between Chapter 11 and the rest of the Plan

The fact that the entire Chapter on waste is a late addition is also illustrated by its inconsistency with other parts of the Plan. A waste incinerator would actually conflict with 7 of the LDP's 10 Objectives (numbers 1, 2, 4, 5, 6, 9.10), listed on pages 9-12.

Some of the statements in other parts of the plan also conflict starkly with a waste Incinerator (and Chapter 11) :

- "Development should be directed away from areas where flood risk is identified as a constraint" (page 16)
 - "Development in the countryside should only be permitted where the use is appropriate in the countryside, respects and enhances the landscape character and biodiversity of the of the immediate and surrounding area of the immediate and surrounding area and is appropriate in scale and design. (p18)
 - "The sustainable management of waste in Newport will be facilitated by treatment facilities ...that represent the Best Practicable Environmental Option having regard to the ... proximity principle. (Page 33) (Double conflict as Veolia's proposal is not BPEO and breaches proximity principle)
 - GP2 General Development Principles – General "...there will not be significant adverse effect on local amenity ... including ... noiseodours, and air quality". (p 38)
 - GP5 General Development Principles – Natural Environment "...proposals [have] ...no significant adverse effects on areas of nature conservation interest including international, European, national... and local protected habitats and species ... (page 40)
 - "...Proposals that are likely to have a significant effect upon the European sites will be considered contrary to the ethos of the Plan" (Para 3.22 - page 41)
 - "Development with the potential to affect [an SSSI or NNR] ... the developer must demonstrate the case for development and why it could not be located on a site of less significance for nature conservation" (Para 3.23 page 41).
 - T2 Heavy Commercial Vehicle Movements. "Developments which generate heavy commercial vehicle movements will be favoured in those locations which allow access to a railway line, wharf or dock. Where it can be demonstrated that this is not appropriate, locations readily accessible to strategic and principal routes will be favoured. Elsewhere, such development will not be permitted." It is clear that the provisions of the waste site at Llanwern under W1 has entirely ignored the (correct) proposals already made at T2 because there is no mention in Chapter 11 of using the existing access to rail at Llanwern. It is hard not to conclude that this is because Veolia have not mentioned it in their application.
- There are more conflicts – eg Para's 3.2, 3.33., 3.38, 3.40, 3.45, 4.6, 4.30, 4.32, 4.37, 4.42, 4.51, 4.56, 7.6, 7.10 and elsewhere.
- In conclusion SNIC call for Chapter 11 of the LDP to be re-written to remove all references which would support the construction of a mass-burn waste incinerator, and to support the existing Council waste policy strategy of 2004. A starting point for the amendments required should be the proposals made by the Opposition which were narrowly rejected by the previous Aminditsrion in the full Council meeting on 27 March 2012.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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2193.D1	Cantwell, Mr			25/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: MS

Document: Deposit Plan, p.0

Site: 146/300.C1 Penrhos

Summary: Objection to Site Ref 300 C1 Penrhos Farm - no longer a proposed site

Item Question Representation Text

14 14 Representation

I am listing below my objections to be proposed Candidate Sites within Caerleon and I request that there objections be duly recorded.

Site Ref No.: 300 C1 Penrhos Farm

The existing transport infrastructure within Caerleon would be totally inadequate.

The size of the development would place intolerable strain on existing educational and medical facilities.

The increased levels of traffic would bring more pollution, cause damage to historic buildings and raise the levels of noise pollution.

The development would have an extremely adverse impact on the landscape – encroaching into old woodlands and destroying public footpaths which are a joy for the public to walk in such a pleasant rural setting with its wonderful views.

Sport activities which have taken place in the past on the proposed site have generated excessive and intolerable noise levels as the sound has been funnelled down the valley.

Public funding was granted a number of years ago to the owners of Penrhos Farm to help preserve the farm house as it is a rare example of a "tall Monmouthshire farmhouse". It is my understanding that this public funding was made available to preserve the unique features of this building within its appropriate setting i.e. in rural and agricultural environment – not surrounding by a large development as proposed.

Greenfield sites such as these should remain for the benefit of generations yet to come and the enjoyment of the present generation.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2193.D2	Cantwell, Mr			25/06/2012	<input type="checkbox"/>	P			M	

Council Officer: MS

Document: Deposit Plan, p.0

Site: 152/1665.C1 Park Farm, Caerleon

Summary: Objection to Ref 1664 C1 Park Farm

Item Question Representation Text

14 14 Representation

Site Ref: 1665 C1: Park Farm

This is a greenfield site.

The massive scale of the development would place intolerable strain on existing medical and educational facilities.

It would lead to more noise and pollution and damage to historic buildings in the village.

The road network is totally inadequate.

Existing public footpath would be destroyed.

The ancient Lodge Hill fort will be disturbed.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2193.D3//H01	Cantwell, Mr			25/06/2012	<input type="checkbox"/>	P			M	

Council Officer: MS

Document: Deposit Plan, p.62

Site: 59/155.J1 St Cadoc's

Policy: H01

Summary: Objection to St Cadoc's site

Item Question Representation Text

14 14 Representation

Site Ref: Page 64 sect 5.5 St Cadoc's

If this site does become available as a "windfall", listed below are my objections;

The existing infrastructure is totally inadequate.

The railway bridge on Lodge Road was never designed to cope with the existing levels of traffic let alone the massive increase of traffic flow which would be generated by this and the other proposed developments.

This development would bring increased levels of pollution and noise with damage to historic buildings in the village.

This development would place an intolerable strain on existing medical and educational facilities.

The proposed railway station has almost non-existent parking.

The current gridlock times in Caerleon during time term which are currently between 8am and 9am and 3pm and 4pm have now been extended until later because of traffic entering and leaving the university at the beginning and the end of the university working day.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2193.D4//CF10	Cantwell, Mr			25/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: MS

Document:Deposit Plan, p.105

Site: 411/ Celtic Manor

Delete Site

Policy: CF10

Summary: Objection to any further development of Celtic Manor site

Item Question Representation Text

14 14 Representation

Site Ref: Page 105 CF10 Celtic Manor

The Usk Valley is an area of outstanding natural beauty and any further development of the Celtic Manor would have a profoundly negative impact on the environment for generations to come.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2193.D5//GP04	Cantwell, Mr			25/06/2012	<input type="checkbox"/>	P			M	
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Council Officer: MS

Document:Deposit Plan, p.39

Policy: GP04

Summary: Traffic infrastructure in Caerleon is inadequate to cope with further development

Item Question Representation Text

14 14 Representation

Traffic (Page 65 5.7)

The traffic infrastructure in Caerleon is totally inadequate to cope with any further development.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2339.D1//SP14	EVOCATI Limited			25/06/2012	<input type="checkbox"/>	E	O		M	

Council Officer: MS

Document: Deposit Plan, p.26

New Site

Policy: SP14

Map: Proposals Plan - West

Summary: Propose a relief road to alleviate traffic problem in Caerleon.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number SP7 Green Wedges and SP14 Transport proposals	
3	3	Paragraph or section number(s) SP(7 iv) Caerleon and Cwmbran SP14 Transport proposals (iii, iv, v, viii)	
4	4	The Proposals Map For SP7 (iv)	
5	5	Inset Plan(s) No.27	Yes
11	11	Site Name Protection of the well-being of Caerleon	
14	14	Representation The approach to the SA and the LPD has meant that critical well-being factors have been omitted. The village of Caerleon experiences an excessive amount of traffic because, apart from being a residential area, it has: •Schools & University •Commercial and leisure/tourist facilities •Hospital •Conservation Area / Heritage sites •Planning is proposed for a number of additional residential sites. •A railway station is proposed. The highway system operates beyond its capacity and many times it fails at peak periods. The main problem in highway terms is that it attracts excessive through-traffic. Add to this that the only routes linking parts of the village is across two old bridges over the railway (Old Station Bridge and Lodge Road). Failure of one or both of these would be disastrous. A credible contingency and permanent solution to the problem is a highway to remove the problems by recommending a new relief highway traverse Area SP7 (iv). This means making a prudent choice in terms of sustainable between part loss of open-space (environmental well-being) together with a private loss of view to a few residents and a critical impact in terms of social and economic well-being for all the area. Funding is another matter. It may either be by CIL or by a limited allocation of residential development set discretely within SP7 (iv).	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness									
P2 CE1 CE2										
<i>Item Question</i>										
6 6	A new policy									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2339.D2//SP01	EVOCATI Limited			25/06/2012	<input type="checkbox"/>	E			M	

Additional material submitted

Council Officer: MS

Policy: SP01

Summary: Sustainability/well-being comments

Item Question Representation Text

- 2 2 Policy Number
SP1 Spatial Strategy and Strategic Policies
- 3 3 Paragraph or section number(s)
Page 14 1.22 et seq. impacts on the whole LDP.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Sustainability

1.22 States that the Newport Local Development Plan is being prepared with sustainability woven through it. Also the achievement of this has been assisted by a process of Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA, often referred to as SA for short) being carried out at key stages in plan preparation, with the results then feeding into the next stage of the plan.

However, the approach to sustainability echos the distortions and bias in the Sustainability Appraisal. (This has been commented on separately in respect of the SA consultation).

It is evident that the only definition of sustainable development in the LDP is the one from the Wales Spatial Plan (page 8) - "Sustainable development is about improving well-being and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources."

PPW should have been the basis for a balanced sustainable LDP and is stated as meaning:

"enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own and future generations in ways which:

- promote social justice and equality of opportunity; and
- enhance the natural and cultural environment and respect its limits - using only our fair share of the earth's resources and sustaining our cultural legacy."

Planning Policy Wales (Edition 4, 2011)

The SA states this but that is as far as it goes. In following the lead of the content of the SA the LDP does not even state sustainable development in terms of its own national planning policy.

The result is that we do not see social, economic and environmental (ESE) 'well-being' as the basis for sustainability objectives except only in respect of providing an environment that encourages healthy and safe lifestyle choices and promotes wellbeing.

The application of PPW itself has become unacceptably skewed towards environmental sustainability alone, relegating well being and its assessment merely in respect of human health and welfare

The LDP and the SA alongside it are only of limited use given the nature of the bias, distortions and irregularities within them. Sustainability is supposed to be the long-term maintenance environmental economic, and social of well being considered in an integrated way to produce the most optimum outcomes and providing evidence of prudent sustainable governance.

Put another way well-being is supposed to apply to the economy, environment and social factors not just physical, mental health and life satisfaction of people. The well being of all three including the economy should be covered here as part of sustainable governance but has been discarded.

This means that there is no mechanism in the Sustainability Appraisal in which strategies, programs and sites can be effectively cross-impacted in terms of economic, social and environmental well-being. The sustainable governance of Newport City Council has been fettered by a deliberate bias towards social and particularly environmental sustainability. The economic and therefore social well-being of Newport is being put at risk by misdirection and misapplication of policies.

15	15	Do you want to speak at Public Examination?								
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No

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness
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P2 C1 CE1

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2339.D3//SP20	EVOCATI Limited			25/06/2012	<input type="checkbox"/>	E			M	

Council Officer: MS

Document:Deposit Plan, p.32

Policy: SP20

Summary: Friars Walk Scheme/Newport City Centre comments

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP20 assessment of retail need and R1 City Centre Schemes	
3	3	Paragraph or section number(s) Page 32 and 33 2.82 to 2.84 Page 88 Paragraphs 8.3 and 8.4	
7	7	A new paragraph or new text.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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An important feature of the City Centre is the Friars Walk scheme but the LDP omits details pertinent to future policy making. The following are important and factually accurate.

- In 2006 Newport City Council made the Newport City Council (Redevelopment of John Frost Square) Compulsory Purchase Order 2006 to redevelop part of the city centre in an area abutting the traditional core prime shopping area of Commercial Street. It was to provide a mixed use retail/leisure /residential development with parking and works to the bus station

- In 2005 Expressions of Interest had been subsequently invited culminating in Modus Corovest Newport Ltd. (Modus) as the preferred developer partner.

- The scheme was empowered by the Section 226 (1)(a) of the Town and country Planning Act 1990 as amended and fulfilled the qualifying well-being condition of s.226 (1A).

The Statement of Reasons of the CPO confirmed elements of the planning background that the scheme:

1. followed Tan 4 to "support a positive approach to growth and promote, not just protect established centres."

2. followed UDP 1996-2011 Policy SP18 "...that retail proposals in or adjoining the city centre ... will be permitted where they enhance the retail function of that centre."

3. was to respond to the Central Area Master Plan which inter alia requires the "Revitalisation of the city centre and the addition of retail opportunities to complement Commercial Street"

- In March 2007 the Inspector recommended to the Welsh Ministers that there was a compelling case in the public interest and the scheme should be confirmed which it was without challenge.

- On the 4th April 2007 the Newport CC gave notice of confirmation of the CPO and notice of its intention to make a GVD.

- By 16 June 2009 it had become clear that Modus, in financial difficulties was unable to fulfil the terms of its development agreement with the Newport City Council and the Cabinet resolved

1. to complete all outstanding acquisitions under the Order,

2. not to extend the Modus

Corovest development agreement (due to expire - July 2009)

3. to draw up proposals to re-market the site.

4. to seek

financial support from external sources in order to advance the provision of a major shopping development in the heart of the city."

- The GVD was executed in November 2009, despite Iceland Foods' assertion in a High Court challenge that this would be illegal, and its notice of making served on 21st December 2009

Newport City Council's Policy Problem

In 2007/8 Newport City Council and its preferred developer Modus Corovest Newport Ltd. (Modus), in the period following the confirmation of the CPO, in contravention of and undermining its own policies, signed-up M&S, Boots, River Island – Commercial Street as occupiers for the proposed development. The John Frost Square CPO scheme Friars Walk should complement Commercial Street and not substitute it. It should have the effect of reinforcement but not replacement nor displacement where an attempt is made to re-establish the retail core in another location in the centre, even plundering the Commercial Street of some national stores to bolster the scheme.

Even though Modus have departed and Queensberry have taken their place it is highly possible that Commercial Street will be plundered of stores for Friar's Walk with nothing in this LDP to protect it.

The activities and intentions of Newport CC and its developer/s were not brought to the attention of the Inspector who recommended Confirmation nor the Judge in the Iceland case who actually queried the lack of evidence in respect of the gap period between Confirmation and GVD.

Recommendation

As the scheme was delivered, with a reasonable prospect that the scheme would proceed, on the basis of the stated policies before the Inspector and the Scheme, confirmed by Welsh Ministers plus assurances given to a High Court Judge the very least that should happen to further protect Commercial Street is that the above extant policies should be retained and inserted in the LDP at 8.4.

15	15	Do you want to speak at Public Examination?								
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Yes

16	16	Subject to speak on at Examination								
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Only to produce evidence if required. Other than that I do not need to speak at the hearing session.

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

Item	Question	Tick-box reply
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Tick-box reply

6	6	A new policy
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2339.D4//R1	EVOCATI Limited			28/05/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.88

Policy: R1

Summary: Concern Friars Walk development would result in shops leaving Commercial Street

Item Question Representation Text

2 2 Policy Number

SP20 assessment of retail need and R1 Centre Schemes.

3 3 Paragraph or section number(s)

Page 32 & 33 2.82 to 2.84 Page 88 Paragraphs 8.3 & 8.4

7 7 A new paragraph or new text.

Yes

11 11 Site Name

Friars Walk

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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3. was to respond to the Central Area Master Plan which inter alia requires the "Revitalisation of the city centre and the addition of retail opportunities to complement Commercial Street"

- In March 2007 the Inspector recommended to the Welsh Ministers that there was a compelling case in the public interest and the scheme should be confirmed which it was without challenge.

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Recommendation

As the scheme was delivered, with a reasonable prospect that the scheme would proceed, on the basis of the stated policies before the Inspector and the Scheme, confirmed by Welsh Ministers plus assurances given to a High Court Judge the very least that should happen to further protect Commercial Street is that the above extant policies should be retained and inserted in the LDP at 8.4.

15	15	Do you want to speak at Public Examination?								
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Yes

16	16	Subject to speak on at Examination								
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Only to produce evidence if required,. Other than that I do not need to speak at the hearing session.

Item Question	Soundness Test	
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1	1	I think the LDP is sound.								
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No

13	13	Test of Soundness								
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CE1, CE2

Item Question		Tick-box reply
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6	6	A new policy								
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Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2352.D1//GP05	Ansell, D.				<input type="checkbox"/>	E			M	

Petition of 10 signatures

Council Officer: MS

Document:Deposit Plan, p.40

Policy: GP05

Summary: Happy with Council's stance on Green Belt / Wedge / Countryside - concerned about potential development in Caerleon

Item Question Representation Text

14 14 Representation

Dear Sir / Madam,

I am writing on a collective basis on behalf of my family and ten of my neighbours. We would like to commend the council on its stance of maintaining green belt / wedge / countryside areas and of not supporting development applications (other than for existing properties), for inclusion in the LDP, which require the use of these designated areas.

We still have some concerns regarding possible future major housing developments in the Caerleon area based on infrastructure and increased traffic congestion / parking problems. Whilst it is understood that that there currently is no inclusion of a scheme for development of the St Cadoc's site, any such application should be considered very carefully to ensure protection of the environment.

I wish to thank Lucie Taylor and Lindsay Christian for dealing with queries and providing information / advice in a pleasant and professional manner. They always took time to address enquires even when, I suspect, they were under a lot of workload pressures.

I shall be obliged if you will keep me updated about future progress of the new LDP.

Yours faithfully,

David Ansell

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2420.D1	Williams, C			03/05/2012	<input type="checkbox"/>	P	S		M	

Document:Deposit Plan, p.0

Summary: Support that the LDP is sound

<i>Item Question</i>	<i>Representation Text</i>	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

2441.D1//SP01	Davies, Mrs N			27/05/2012	<input type="checkbox"/>	W	S		M	
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Document:Deposit Plan, p.14

Policy: SP01

Summary: Support the brownfield strategy and realise the impact of development

<i>Item Question</i>	<i>Representation Text</i>	
4 4	The Proposals Map	Yes
14 14	Representation I approve of the plan in as much as it does not include building in Bassaleg. I understand the need to build on brown field sites such as the old Alcan site and the old golf course, but realise the impact that these will have on the overcrowded schools and the terrible traffic problems on Forge lane	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2441.D2	Davies, Mrs N			27/06/2012	<input type="checkbox"/>	W			M	

Document:Deposit Plan, p.0

Summary: Agree with LDP in that is does not propose any development in Bassaleg

Item Question Representation Text

14 14 Representation

I am writing to say that I agree with th Local Development Plan in as much as it does not include building in Bassaleg. I understand the need to build on brown field sites such as the old Alcan site and the old golf course, but realise the impact that these will have on the overcrowded schools and the terrible traffic problems on Forge Lane.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2453.D1 Forshaw, Mr Tim

25/06/2012

E

M

Council Officer: MS

Document:Deposit Plan, p.0

Summary: Pleased that potential candidate sites in Caerleon have been removed - no major concerns for the site at Cambria Close, Mill Street.

Item Question Representation Text

14 14 Representation

For the record, I would like to lodge the following comments:-

1. I'm very pleased that all but one of the Candidate Sites have been excluded from the Deposit Plan. This shows that Newport City Council has listened to the concerns of Caerleon's residents.
2. May I request that any moves by the original submitters of these excluded Candidate Sites to have them reinstated be turned down.
3. I have no major concerns regarding the one included Candidate Site, namely that on Cambria Close off Mill Street.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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2453.D2//CF10	Forshaw, Mr Tim			25/06/2012	<input type="checkbox"/>	E			M	
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Council Officer: MS

Policy: CF10

Summary: Support Council's view that Celtic Manor Resort should be subject to overall 'sub plan' to ensure no adverse impacts on Caerleon

Item Question Representation Text

14 14 Representation

4. I support the Council's view that the Celtic Manor Resort should be subject to an overall 'sub plan' to ensure that any development won't have an adverse affect on Caerleon or the wider environment.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2453.D3//H01	Forshaw, Mr Tim			26/06/2012	<input type="checkbox"/>	E			M	
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Council Officer: MS

Document:Deposit Plan, p.62

Policy: H01

Summary: Reservations about the possible development of St Cadoc's Site

Item Question Representation Text

14 14 Representation

5. I retain a reservation about the possible future development of the St. Cadoc's site. Whilst I note that this Candidate Site has not been included in the Deposit LDP, the way is left open for it to be a 'windfall site' should it become available during the lifetime of the LDP. In these circumstances, I would urge that planning permission be denied on the grounds that Caerleon's infrastructure could not cope with the number of additional housing units which this site could support, whether or not a railway station is built.

6. Please may I be informed directly of any reconsideration of the Candidate Sites which were excluded, or any new Candidate Sites proposed for Caerleon.

Thank you once again for attending the meeting, and for listening to Caerleon's residents.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2474.D1//H01	Griffiths, Mr John			27/06/2012	<input type="checkbox"/>	P			M	

Council Officer: MS

Document: Deposit Plan, p.62

Policy: H01

Summary: Objection with regard to the site at St Cadoc's and concerns with sustainability of Caerleon and the road system.

Item Question Representation Text

2 2 Policy Number

All of the plan where it feeds additional traffic and congestion into the already congested village road network. All parts of the plan where any increase in traffic will add to the already very high levels of pollution (despite monitoring since 2006 nothing is done, except now to add more pollution)

14 14 Representation

The plan and the forms for comments are particularly complete for me as a lay person so I have written my observations on the following paper. I particularly wish to endorse the very strong feelings about any further development in Caerleon as expressed by local residents at the public meeting in the town hall on 22nd May 2012.

I only wish to speak at a hearing session if the very strong community feeling against any further development in Caerleon (as expressed very clearly at the public meeting on 22nd May in the Town Hall) needs further conformation. I cannot add much to the sentiment that all development should cease until the issues of traffic through the village are remedied.

Additional Observations

1. The sustainability of the St Cadoc's proposal is erroneously based on the notion of it being a 'brownfield' site. It is the nearest thing to a 'park' that Caerleon has. Less than half the total 18 hectares (as proposed in the 2009 plan) comprises 'built on land' (and many of these buildings are listed in some way or other). The greater part of this site is grassland, lawns, pasture, re-generating scrub/woodland, and elegant tree lined avenues (many trees have preservation orders). When designed 100 or so years ago it was a truly self contained 'sustainable' community with its own horticulture, husbandry and crafts to sustain life for less fortunate people. An asylum was a place of refuge.

What is now proposed is the opposite of sustainability. In fact, it gives very little credence to sustainability. Should the original 2009 plan go ahead (I realise that this is not now in the current proposed plan - but there is nothing to stop the developer seeking to include it again even at this late stage) 18 hectares could be developed. Under current planning guidelines between 900 and 1200 units (houses) could be built. At 4 people per house, and 2 cars per household this could result in 4,800 more people and 2,400 extra vehicles.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

I only wish to speak at a hearing session if the very strong community feeling against any further development in Caerleon (as expressed very clearly at the public meeting on 22nd May in the Town Hall) needs further conformation. I cannot add much to the sentiment that all development should cease until the issues of traffic through the village are remedied.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

Sustainability of Caerleon Village
Sustainability of road system

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
<i>Item Question</i>		<i>Tick-box reply</i>								
6 6	A new policy								Yes	
10 10	Delete an existing site.								Yes	
2474.D2//H01	Griffiths, Mr John			26/06/2012	<input type="checkbox"/>		P		M	

Document: Deposit Plan, p.62

Policy: H01

Summary: Objection with regard to the site at St Cadoc's and concerns with sustainability of Caerleon and the road system.

Item Question	Representation Text
2 2	Policy Number All of the plan where it feeds additional traffic and congestion into the already congested village road network. All parts of the plan where any increase in traffic will add to the already very high levels of pollution (despite monitoring since 2006 nothing is done, except now to add more pollution).
14 14	Representation 2. Sustainability seems to look inwardly at each site. The larger, outward sustainability of the whole fabric and village of Caerleon is not considered. For example, the pollution problem known about since 2006 is not been addressed. How then can the independent inspector's role show 'good judgement' and 'be able to be trusted'? The existing road around the village's one way system cannot sustain any more traffic. The narrow railway bridge just beyond the south entrance to the hospital barely allows two cars to pass. How then can the new traffic enter and leave the St Cadoc's site? Just up the road is the entrance to the university and beyond that a single lane country road to Malpas. It is difficult to understand how independent sustainability appraisals (at no doubt considerable costs) can support any further development given the present road patterns. Access to the village already has bottlenecks and long tailbacks at key intersections (eg at either end of Goldcroft Common) and the river bridge entering Caerleon. All it takes is a bus, a parked delivery van or a refuse lorry stopped anywhere on the one way 20 mph system for chaos to happen.
Additional Information Submitted - Available on Request	
15 15	Do you want to speak at Public Examination? Yes
16 16	Subject to speak on at Examination I only wish to speak at a hearing session if the very strong community feeling against any further development in Caerleon (as expressed very clearly at the public meeting on 22nd May in the Town Hall) needs further conformation. I cannot add much to the sentiment that all development should cease until the issues of traffic through the village are remedied

Item Question	Soundness Test
1 1	I think the LDP is sound. No
13 13	Test of Soundness Sustainability of Caerleon Village Sustainability of the road system
<i>Item Question</i>	
<i>Tick-box reply</i>	
10 10	Delete an existing site.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2474.D3//H01	Griffiths, Mr John			27/06/2012	<input type="checkbox"/>	P			M	

Council Officer: MS

Document:Deposit Plan, p.62

Policy: H01

Summary: Objection with regard to the site at St Cadoc's and concerns with sustainability of Caerleon and the road system.

Item Question Representation Text

2 2 Policy Number

All of the plan where it feeds additional traffic and congestion into the already congested village road network. All parts of the plan where any increase in traffic will add to the already very high levels of pollution (despite monitoring since 2006 nothing is done, except now to add more pollution).

14 14 Representation

3. Talk of a station is a long standing myth (where have been the tests of 'soundness'). To locate it on the St Cadoc's site is to generate even more traffic and congestion. It is not just Caerleon residents who might use the facility. Commuters from a wide surrounding catchment would drive in and park wherever they could. This way it would be an easy commute to Bristol, Cardiff and even London. If a station is to be seriously planning for them a better possible site would be on the Ponthir side of the village eg on the old brickworks.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

I only wish to speak at a hearing session if the very strong community feeling against any further development in Caerleon (as expressed very clearly at the public meeting on 22nd May in the Town Hall) needs further conformation. I cannot add much to the sentiment that all development should cease until the issues of traffic through the village are remedied.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

Sustainability of Caerleon Village
Sustainability of road system

Item Question

Tick-box reply

6 6 A new policy

Yes

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2933.D1	Sullivan, Mr James			27/06/2012	<input type="checkbox"/>	E			M	

Council Officer: MS

Summary: Concerned that planning permission is being considered in an area which depends so heavily on its one-way system and ancient infrastructure

Item Question Representation Text

14 14 Representation

To whom it may concern,
Last week I attended a packed public meeting to gain some clarification on the Deposit LDP.

The meeting was little more than pointless because,

- 1) After a half-hour introduction to the meeting, the audience was barred, by the chairman, from asking more than one question per person and discussion was not allowed.
- 2) The presenter's microphone was intermittent,
- 3) The presenter ignored my question which was a request for her to point out the position of the current border of the housing on Lodge Hill.
- 4) The projected map, to which my question referred, was so indistinct as to be unreadable - as it is on the NCC web site.
- 5) The chair person allowed an interruption from a person in the row behind forcing me to repeat the question which was again ignored.

I then remarked on the pointlessness of remaining at the meeting and left. It has come to my attention that several others also left a little later on.

Because of the poor running of this meeting and confusing nature of the NCC website, I request that the Deposit LDP be postponed until all those interested are given full and clear information on the current LDP situation.

I find it impossible to understand,

- 1) why planning permission is even being considered for the building of more and yet more houses in an area which depends so heavily on its one-way system and ancient infrastructure,

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2933.D2//CF10	Sullivan, Mr James			27/06/2012	<input type="checkbox"/>	E			M	

Council Officer: MS

Policy: CF10

Summary: Concerned about Celtic Manor event traffic being allowed to use the Usk Valley via the one-way system

Item Question Representation Text

14 14 Representation

2) why the decision to disallow Celtic Manor event traffic in and out of the Usk Valley via the one-way system has been reversed - along with many of the other associated decisions,

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2933.D3//R12	Sullivan, Mr James			27/06/2012	<input type="checkbox"/>				M	
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Council Officer: MS

Policy: R12

Summary: Concerned that a mini supermarket is allowed to operate from the Angel public house site

Item Question Representation Text

14 14 Representation

3) why a mini supermarket is to be allowed to operate from the Angel public house site.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2933.D4//CE08	Sullivan, Mr James				<input type="checkbox"/>	E			M	
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Council Officer: MS

Policy: CE08

Summary: Concern that building is going ahead on the remaining fields of Lodge Hill - an area steeped in ancient history

Item Question Representation Text

14 14 Representation

4) why consideration is being given, against council policy, to build on the remaining green fields of Lodge Hill - an area steeped in ancient history (See last attached picture to be aware how the amazing view over the newly-discovered Roman remains would disappear from the public footpath.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2933.D5//CF10	Sullivan, Mr James			27/06/2012	<input type="checkbox"/>	E			M	
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Policy: CF10

Summary: Concern that the Celtic Manor Resort are proposing to build 10 lodges for visitor accommodation

Item Question Representation Text

14 14 Representation

Please seriously consider all the points above, in addition to an application by the Celtic Manor Resort who propose to build ten lodges for the provision of visitor accommodation within the Resort. before proceeding further.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2992.D1//SP01	Clifford, Mrs Tracey			27/06/2012	<input type="checkbox"/>	E			M	

Council Officer: MS

Document: Deposit Plan, p.14

Policy: SP01

Summary: Disagree with greenbelts/green spaces being damaged because of development

Item Question Representation Text

14 14 Representation

As you will note, I totally disagree with any greenbelts, greenspaces, environmental spaces etc being damaged because of development and sustainability for future employment.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2992.D2//CE05	Clifford, Mrs Tracey				<input type="checkbox"/>	E			M	
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Council Officer: MS

Site: 77/53.C1 Bethesda Field, Rogerstone

Policy: CE05

Summary: Passionate that Bethesda Fields is protected as an environmental space or utilised as a greenfield

Item Question Representation Text

14 14 Representation

Within Rogerstone, I am passionate that Bethesda Field is protected now and for the future as a designated 'environmental space' or utilised as a greenfield for the health & wellbeing of the local community to enjoy for eg, allotments/small livestock holdings (chickens). My attached documents will provide reasons for saving this field.

I would rather see the focus site re-utilised as a new train station. There is already adequate car parking & the railtrack is already in use and very close to the focus site. This would situate the new train station, not far from where the very old station used to be situated, near Havana Bakeries. It would also benefit the wider community who live centrally in Rogerstone.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
2992.D3//R11	Clifford, Mrs Tracey			27/06/2012	<input type="checkbox"/>	E			M	

Council Officer: MS

Document:Deposit Plan, p.96

Policy: R11

Summary: Enough retail close to Rogerstone - Rogerstone in danger of losing its village/rural status

Item Question Representation Text

14 14 Representation

There are enough retail developments close to Rogerstone for eg, Morrisons, Tescos, Tescos extra, Asda, Co-op. Also no extra housing should be considered for this site, as Rogerstone is in danger of losing its 'village' & 'rural' status.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2992.D4//EM01.08	Clifford, Mrs Tracey			27/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: MS

Document:Deposit Plan, p.74

Site: 442/ Land off Chartist Drive

Delete Site

Policy: EM01.08

Summary: Old Focus site should not be considered as an extension to the Wern Industrial Estate

Item Question Representation Text

14 14 Representation

The old focus site should not be considered as an extension to the 'Wern Industrial Estate' due to noise & smell pollution already causing the local community some disquiet in the area.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2992.D5//H15	Clifford, Mrs Tracey			27/06/2012	<input type="checkbox"/>	E	O		M	
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Council Officer: MS

Document:Deposit Plan, p.71

Site: 335/ Former Alcan Site

New Site

Policy: H15

Summary: Novelis Alcan site - better utilised as part of the Welfare Grounds

Item Question Representation Text

14 14 Representation

The Novelis Alcan site would be better utilised by decontaminating the ground and possibly extending as part of the Welfare Grounds for extra physical activities such as rugby, athletics, connecting to the Sirhowy Valley walking route & local riverbank.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

2992.D6	Clifford, Mrs Tracey			27/06/2012	<input type="checkbox"/>	E			M	
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Council Officer: MS

Document:Deposit Plan, p.0

Summary: Rogerstone does not need any more housing/retail/industrial development

Item Question Representation Text

14 14 Representation

Rogerstone does not need any more housing/retail development/industrial development. Rogerstone is an old village which is being developed out of size and character with an infrastructure which is not capable of all the extra highway traffic/over capacity of schools/lack of GP's & Dental Surgeries

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
2993.D1//H01	Athay and Margaret Chittock, Rosemary			01/05/2012	<input type="checkbox"/>	E	O		M	

SA/SEA submitted
Council Officer: MS

Document:Deposit Plan, p.62

Site: 323/ Land at Pwll Coch

New Site

Policy: H01

Summary: Proposed new site for Land at Pwll Coch

Item Question Representation Text

14 14 Representation
New site at Pwll Coch submitted.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3009.D11//CE05	Bethesda Field Action Group			27/06/2012	<input type="checkbox"/>	P			M	
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Petition of 1827 signatures

Council Officer: MS

Site:

Policy: CE05

Summary: Support LDP which excludes the proposed Candidate Site 53.C1 Bethesda Field for development

Item Question Representation Text

14 14 Representation

I enclose a Deposit Representation Form completed on behalf of 1827 residents of Rogerstone who wish to support the LDP which excludes proposed Candidate Sites 53.C1 Bethesda Field.

I trust you will be able to accept this as a Group representation – Newport Planning Department has already had sight of residents' letters of objection, on-line objections, petition signatures, plus additional letters were forwarded directly to Newport Planning prior to October 2011, when planning permission was refused by Newport Planning Committee (11/0590).

The Representation Form does not provide a suitable format to meet our particular circumstances (we do not want to add/amend/delete a site, but simply support that this site has not been included) so I give our reasons below – if you need the Form completing in a different way, please advise:

Rogerstone Residents wish to support the LDP as proposed – i.e. Bethesda Field not included as a Candidate Site for housing development, under policies:

0.9 Protection of green spaces of all kinds

010 Availability of a good supply of brownfield land

0.13 Availability of new greenfield sites would serve to undermine the brownfield strategy.

GP2 Development not permitted where a significant adverse effect / detrimental to visual amenities

GP4 Development would not be detrimental to highway safety

CE5 Environmental Spaces will be safeguarded.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Neither
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Item Question Soundness Test

1	1	I think the LDP is sound.	Neither
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3019.D1//SP02	Prygodzicz, Mr Josef			27/06/2012	<input type="checkbox"/>	E			M	

Additional material submitted

Council Officer: MS

Document: Deposit Plan, p.16

Policy: SP02

Summary: Supports LDP - provided a health impact assessment on the potential impact of the LDP on population level obesity

Item Question Representation Text

14 14 Representation

I have conducted a desktop Health Impact Assessment (HIA - additional attachment) on behalf of the Gwent Public Health Team, on the objectives outlined in the Local Development Plan. The HIA focuses solely on those objectives which have the potential to impact on levels of obesity within the population including: opportunities to incorporate active travel; healthy eating; active recreation; and physical activity within developments. The HIA also highlights any potential risks to population health related to not doing this.

Please note that whilst we are part of the Aneurin Bevan Health Board Gwent Public Health Team, this HIA does not constitute a formal response on behalf of the Aneurin Bevan Health Board. Importantly this submission does not include consideration of the potential impact of the LDP on increasing/changing need for health services provision – please contact the Planning Division of the ABHB if you require that input.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3025.D1//SP05	Owen, Lisa	K W Dorrington Architectural Services		18/06/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.18

Site: 285/ Land at Pentwyn Lane

New Site

Policy: SP05

Summary: Inclusion of housing site at Pentwyn Lane, Bettws

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP5	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name 3025 - Late addition/no name	
12	12	Site Reference 3025	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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This statement and documents are intended to vary the Proposed Policy regarding development in the Open Countryside and making allowance for certain small sites - such as this site.

This document has additional details that can be used by the Council to ascertain how certain sites (that would currently fall outside the proposed policy) but should be viewed as acceptable. The current planning application includes all necessary details.

SITE LOCATION-

The application site is located immediately adjoining the Llandeud Inset Map 11. A Location Plan is attached.

The "Chuckles Nursery" building used to be a Public House, after its closure it was converted into a Children's Nursery.

The site borders the adjacent "Mill Heath" Housing development. The proposal is for a single dwelling house that will be the sole permanent residence of the Nursery Owner (the applicant to this application).

The land is set within a large Car park serving the Nursery.

SP5 Countryside

DEVELOPMENT IN THE COUNTRYSIDE (THAT IS, THAT AREA OF LAND LYING BEYOND THE SETTLEMENT BOUNDARIES SHOWN ON THE PROPOSALS MAP) WILL ONLY BE PERMITTED WHERE THE USE IS APPROPRIATE IN THE COUNTRYSIDE, RESPECTS AND ENHANCES THE LANDSCAPE CHARACTER AND BIODIVERSITY OF THE IMMEDIATE AND SURROUNDING AREA AND IS APPROPRIATE IN SCALE AND DESIGN.

PROPOSAL –

My client seeks to obtain Planning Consent within the Grounds of "Chuckles Nursery" for a single two storey dwelling house. The adjacent nursery and its requirement for car parking full suitably prevent the site being developed. My client does not intend to full develop the site – this application is for a single dwelling house. There is a current Planning Application for this proposal. It's application number is 12/0381. The planning application includes full detailed plans, design statement, access statements and site plans. Please refer to the application, as it has been unable to attach all documents. The proposed site lies within a Car Park, within the Grounds of a relatively large Children's Nursery, in what used to be a Public House. It does not have the feel of the Countryside, it feels as though it is next to Open Countryside – the UDP Plan should confirm the reality on the ground.

Sustainable use of land - Objective 1

To ensure that all development makes the most efficient use of natural Resources by seeking to locate development in the most sustainable locations, Minimises the impact on the environment and makes a positive contribution to local communities. The site is currently an overly large car park. It would make a more suitable use of this car park.

Climate Change - Objective 2

To ensure that development and land uses in Newport make a positive contribution to helping to minimise the causes of climate change and to mitigating the impacts, by incorporating the principles of sustainable design, reducing the need to travel, providing safe and active travel routes, and managing the risks and consequences of flooding The housing of the Manager of the Nursery on this site will reduce the carbon footprint of the nursery, and travelling etc of the dwelling occupier. The development does not lie within a Flood Risk area; neither will the development increase the risk of flooding to any other property.

Economic Growth - Objective 3

To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region.

n/a

Housing - Objective 4

To ensure that there is an adequate supply of land for housing in the most Sustainable locations, and to ensure that the quantity, quality and variety of Housing provision meets the needs of the population. Also to foster the

Creation of places which contribute to local distinctiveness and thriving Communities.

The proposal is to provide the exact house type for the occupier. This issue is relevant to UK planning, where houses are built on mass to a style not directly requested by the future occupiers; it should be noted that single built, purpose designed dwellings are far more suitable for a large number of reasons.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Conservation and the Environment

Objective 5

To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the built environment. The buildings and access are existing. The access and buildings are currently used daily by the applicant. The proposed dwelling will be scarcely visible to road users.

Objective 6

To protect and enhance the quality of the natural environment, including protected and non-protected species and habitats, regardless of Greenfield or Brownfield status, and also including the protection of controlled waters.

The proposed scheme would include a hedgerow planting scheme, which will visually improve the immediate area.

Community Facilities and Infrastructure - Objective 7

To ensure the provision of appropriate new, and/or enhanced existing, community facilities. The development is minor and will not allow for any new community provisions.

Culture and Accessibility - Objective 8

The principle that services and facilities should be sustainable and safely accessible to all regardless of culture, age, gender, and impairment is considered important to achieving sustainable development. Development proposals should therefore provide convenience and enjoyment of use for all and strive to enhance cultural identity. To ensure that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals. The development will be fully disabled accessible.

I trust that this application will be viewed with the current planning application, and judged on its own merits. The site did have a planning application refused some years ago – because of the Open Countryside policy. My client is extremely keen to achieve an approval on this site, but is aware of the current UDP Policy barrier.

I would like to add that having had on site discussions and office telephone discussions that, the Newport planners have been sympathetic to this case; and that hopefully a successful decision will have been made before this process needs to conclude and be added to the proposed UDP. This being said I would still like to see certain Proposed Policies have wording that can make way for certain developments in Open Countryside to be approved – subject to strict conditions and criteria to be made.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination The site, its setting adjacent Open Countryside and amending the boundary	
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	No
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Item Question

Tick-box reply

8	8	Add a new site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3025.D2//SP05	Owen, Lisa	K W Dorrington Architectural Services		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.18

Policy: SP05

Summary: Objection to policy SP5 Countryside as being an overrestrictive policy

Item	Question	Representation Text	
2	2	Policy Number SP5	
7	7	A new paragraph or new text.	Yes
9	9	Amend the boundaries of an existing site.	Yes
11	11	Site Name 3205 - late addition/no name	
12	12	Site Reference 3025	
14	14	Representation	

PROPOSED POLICY SP5 IS TOO STRICT.

The proposed Policy SP5 is too strict. When assessing it's parameters, it becomes clear that there are sites which are, in Planning Terms, classed as Open Countryside; but have little resemblance to countryside.. It is understood that many 'boundary lines' are strategic and can put other fields etc at risk. This site, even if developed, would still have a clearly defined boundary lane – which form a more suitable 'Open Countryside' boundary. SP5 is being proposed to prevent larger scale developments, as well as small developments taking place in Open Countryside – this is correct, however there are exceptions in cases of smaller developments. Whilst it is understood that assessing on a microscopic level is difficult and time consuming, I hope that this application is considered on it's full merits and is seen as an example that could allow the Open Countryside Boundary to be moved to encompass the site, or allow a caveat that makes SP5 more amenable to allow such sites as this site.

Current UDP Open Countryside Boundary (plan hyperlinked to representation)

It should also be considered that being set in Open Countryside the proposed, and current UDP, has restrictions on the existing building and any proposed changes that were to require planning consent – after all it is set within open countryside and any changes would be set against other proposed policies.

PROPOSED ALTERATION TO POLICY-

It is suggested that Proposed Policy SP5 is either amended to allow for small sites to be added – with strict conditions and strictly subject to each site's own merits OR
That an additional policy/paragraph is added to compliment SP5 OR
That the current Open Countryside Boundary is amended to include this site – this may be easier.

SP5 Countryside

DEVELOPMENT IN THE COUNTRYSIDE (THAT IS, THAT AREA OF LAND LYING BEYOND THE SETTLEMENT BOUNDARIES SHOWN ON THE PROPOSALS MAP) WILL ONLY BE PERMITTED WHERE THE USE IS APPROPRIATE IN THE COUNTRYSIDE, RESPECTS AND ENHANCES THE LANDSCAPE CHARACTER AND BIODIVERSITY OF THE IMMEDIATE AND SURROUNDING AREA AND IS APPROPRIATE IN SCALE AND DESIGN.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Yes							
16 16	Subject to speak on at Examination The site, its setting adjacent Open Countryside and amending the boundary									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		No							
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.		Yes							

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3028.D1//SP10	Thomas, Mr Andrew				<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.2121

Policy: SP10

Summary: Asking for more flexibility in Policy SP10 to allow development of site adjacent to Longleat on Chepstow Road.

Item Question Representation Text

2 2 Policy Number
SP10

3 3 Paragraph or section number(s)
Pages 21- 23

4 4 The Proposals Map
Urban Boundary

14 14 Representation
Housing Objective 4 states that new housing will be provided mainly on brownfield sites with an emphasis being placed on the Eastern Expansion Area, and yet a key task of the plan is also to ensure a continuing supply on large brownfield sites with the requirement for major infrastructure works at a considerable cost means that the assumption that a continuing supply of land will be made available is questionable.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
I believe that the plan does not meet the test of soundness in relation to CE2 and CE4 Coherence and Effectiveness tests for the following reasons:
CE2: The strategy, policies and allocations are not realistic and are inappropriate as they have not considered relevant alternatives and are not founded on a robust and credible evidence base as there is an over reliance on brownfield sites that have major upfront infrastructure costs.
CE4: The Plan is not reasonably flexible to enable it to deal with changing circumstances as the over reliance on these major brownfield sites has not taken into account the economic climate and the reduced profitably margins, thus making a number of these sites economically unviable.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3028.D2//SP11	Thomas, Mr Andrew			29/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document:Deposit Plan, p.2323

Policy: SP11

Summary: Too much reliance on the Eastern Expansion area and site adjacent to Longleat on Chepstow Road should be included.

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number SP11	
4 4	The Proposals Map	Yes
14 14	Representation The present economic downturn has resulted in a number of major sites such as these becoming uneconomically viable due to the major upfront costs required to turn these sites into developable land. A number of these sites did not come into fruition in the more prosperous period, which resulted in a building boom, therefore the 1100 units identified within policy H6 for the Eastern Expansion Area are not likely to be developed by 1st April 2026. In order for there to be reasonable flexibility to enable the plan to deal with changing circumstances such as the economic climate smaller, readily available sites need to be identified.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness I believe that the plan does not meet the test of soundness in relation to CE2 and CE4 Coherence and Effectiveness tests for the following reasons: CE2: The strategy, policies and allocations are not realistic and are inappropriate as they have not considered relevant alternatives and are not founded on a robust and credible evidence base as there is an over reliance on brownfield sites that have major upfront infrastructure costs. CE4: The Plan is not reasonably flexible to enable it to deal with changing circumstances as the over reliance on these major brownfield sites has not taken into account the economic climate and the reduced profitability margins, thus making a number of these sites economically unviable.	
<i>Item Question</i>		<i>Tick-box reply</i>
8 8	Add a new site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3028.D3//H01	Thomas, Mr Andrew			29/05/2012	<input type="checkbox"/>	P	O		M	
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Additional material submitted

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 303/ Longleat

New Site

Policy: H01

Summary: Inclusion of Land adjacent to Longleat on Chepstow Road as a housing allocation in Policy H1

Item Question Representation Text

2 2 Policy Number
H1

4 4 The Proposals Map

Yes

14 14 Representation

I am therefore proposing that a smaller site should be included off Chepstow Road adjacent to Longleat (the land once formed part of the cartilage of this property). Consequently the inclusion of the site would necessitate a minor amendment to the urban boundary. The impact would be minimal as it is located at the end of a residential street that has seen major extensions and developments in recent years, thus effectively creating a natural rounding off to this residential street, reflecting a similar development at the opposite end of the road.

The development of this site would not result in opening up the countryside to further development as the site can be readily accessed off Old Chepstow Road with the physical boundary being the natural features of the woodland and stream that is located on the southern boundary. The inclusion of the site will make the urban boundary more robust because it will eliminate future access landscape with woodland boundaries.

The site is located close to community facilities; schools and public transport and therefore complies with the sustainability criteria. The report highlights the potential for protected species and the mitigation that can be taken. The site is not prone to flooding.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

I believe that the plan does not meet the test of soundness in relation to CE2 and CE4 Coherence and Effectiveness tests for the following reasons:

CE2: The strategy, policies and allocations are not realistic and are inappropriate as they have not considered relevant alternatives and are not founded on a robust and credible evidence base as there is an over reliance on brownfield sites that have major upfront infrastructure costs.

CE4: The Plan is not reasonably flexible to enable it to deal with changing circumstances as the over reliance on these major brownfield sites has not taken into account the economic climate and the reduced profitably margins, thus making a number of these sites economically unviable.

Item Question

Tick-box reply

8 8 Add a new site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3029.D1//R5	Williams, Mr Dafydd			29/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.91

Site: 332/ Ringland Shopping Centre

New Site

Policy: R5

Summary: The LDP should not change the Ringland District Shopping Centre to a local shopping area

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
9	9	Amend the boundaries of an existing site.	Yes
		/USE	
11	11	Site Name	
		Hartridge Farm Road	
12	12	Site Reference	
		H1 (57)	

Representation Details

by: Representation No

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14	14	Representation								
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See Document

- 1) Reomendation for reclassifying Ringland District Shopping Centre
- 2) H1(57) I have submitted a late Candidate Site proposal for that site (Send sperately)

Recommendation for Reclassifying Ringland District Shopping Centre

The LDP is deficient in that it incorrectly seeks to reclassify Ringland District Shopping Centre as a local shopping area contrary to advice contained in TAN 4.

LDP document – District Deposit Plan background paper April 2012.

Colliers International Assessment of the Newport's District Centres in particular Ringland District Centre is inaccurate and incorrect with respect to advice given in TAN 4.

TAN 4 Definition of shopping Centres and Local Centres:

District shopping centres – groups of shops, separate from the town centre, usually containing at least one food supermarket or superstore, and non-retail service such as banks, building societies and restaurants.

Local centre – small grouping usually comprising a newsagent, a general grocery store, a sub-post office and occasionally a pharmacy, a hairdresser and other small shops of a local nature.

Ringland Shopping area clearly qualifies as a district shopping centre meeting the criteria as outlined in TAN 4 above.

It contains a Cost Cutter Supermarket part of the Cost Cutter Supermarket Group. This retail type is not present in the definition of a Local centre.

Colliers state:

15.3Newport City Homes occupy a large unit in the corner of the shopping precinct (units 8-11); however, at present this is positioned outside of the district centre boundary.

There is no explanation as to why this large section of the Ringland Shopping Centre is outside the district centre boundary. When the Ringland Shopping Centre conceived, planned and built in the 1960's units 8-11 (a large section of the centre) were and still are an integral part of the district centre courtyard. Units 8-11 are the East Area Headquarters of Newport City Homes and their literature states that "The office can be entered through the main shopping area". The presence of this large A2 classification unit reinforces further the status of this area as a District Shopping Centre.

Conclusion

The classification of Ringland District Shopping Centre as a District Shopping Centre as defined in TAN 4 should remain and the advice of Colliers International should be ignored and removed from the LDP.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
To ensure the Inspector is aware of all the facts.										

Item Question Soundness Test

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1 1	I think the LDP is sound.		No							

Representation Details

Newport City Council Local Development Plan

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3029.D2//CE05	Williams, Mr Dafydd			19/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.49

Policy: CE05

Summary: To change specific ANG sites in Ringland.

Item Question *Representation Text*

Representation Details

by: Representation No

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14 14 Representation

Please see accompanying documents:

- 1) Environmental Spaces Background Paper 2012
- 2) LDP SINC site classification deficiency
- 3) Draft Identification of accessible X Natural Greenspace in Newport 2012 deficiency

Environmental Spaces Background Paper 2012

2.6 TAN 16 states that open space, particularly that with a significant amenity, nature conservation or recreational value should be protected. Local planning authorities should identify these areas in the development plan, and establish criteria against which sites should be assessed if development pressures arise (para 3.12)

3 Identifying Environmental Spaces

3.1 There are many types of greenspaces in Newport including parks, public amenity spaces, woodlands, commons and village greens, wildlife corridors and playing fields. Rather than have separate allocations for each type of green space, it is considered more practical to have one Environmental Space classification, covering all types of greenspaces. In some instances, the same area of greenspace could be used for different purposes by different people. Therefore defining each area for a specific function could be problematic where there are a number of uses that justify the protection of that area. It could also make the Proposals Map difficult to read where several types of open space designation overlay the same area.

1. Deficiency in LDP

The LDP is deficient in that Section 3.1 contradicts the advice in TAN 16 as the individual types are not clearly identified. They are all labelled "Environmental Space". This makes it impossible to see the exact location and extend of each different type of open space especially in areas where different types have been combined into one environmental space.

A recent Open Space Assessment as required by TAN 16 has not been completed for this LDP. Although TAN 16 states:

2.29 Local planning authorities should ensure that an Open Space Assessment has been completed as an important part of the LDP preparation process. However, they should not delay work on the preparation of the LDP where an Assessment is not available. Instead, they should make use of information which is to hand, and in which they have confidence.

The Council has admitted that the information in the Draft Identification of Accessible & Natural Greenspace in Newport – June 2011 is inaccurate and out of date and therefore by that admission they cannot have confidence in it. A proper and thorough Open Space Assessment as was carried out in 2006 needs to be prepared as advised by TAN 16. The Council appears to be using the ANG assessment in different manner to that prescribed by the Countryside Council for Wales including large areas that do not qualify.

An Open Space Assessment was completed in 2006 and in light of the inaccuracies in the document above this should be used instead or until another Open Space Assessment can be completed as that is the most recent accurate document that the council have and in which they can have confidence.

The SUPPLEMENTARY PLANNING GUIDANCE OUTDOOR PLAY SPACE PROVISION is inaccurate as it uses the population of Ringland from the 2001 census and does not include adjustments from the Local Land and Property Gazetteer for the population increase since that census was taken.

This means that all estimates of Public Open Space (formal and informal) are inaccurate and do not reflect the true deficit that Ringland has in regards to these types of Public Open Space.

Remedial Action Required

Accurately identify the different types of open space as listed in TAN 16.
Complete an accurate up to date Open Space Assessment as advised by TAN 16.
Use accurate population data (the 2010 census if available) and recalculate the tablets in the document.

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2. Draft Identification of Accessible Natural Green Space in Newport – June 2011

The LDP is deficient as large areas of Open Space in Ringland have been wrongly classified as types of ANG. (see accompanying document identification of Accessible Natural Green Space in Newport - June 2011 deficiency)

3. Environmental Spaces Identified in Ringland Deficiencies

The LDP is deficient in that it does not classify the Environmental Spaces correctly as outlined below.

Habitat assessments have not been carried out on large areas of Ringland that are very important SINC sites, green corridors and part of the natural habitat network. (see accompanying document SINC site deficiencies in Ringland)

Map Reference 1 – Ringland Wood

Ringland Wood reason for designation reads “Draft Sinc” should read part of natural habitat network and SINC.

Map should identify the area of Public Open Space (formal) that is Ringland Top playing field. Reason for designation for that area should also include SINC. The area should also include reference to a football pitch and identify an equipped area.

Ringland Top Playing Field is incorrectly identified as a “recreation area” on map should be labelled as playing field.

Map Reference 2 – Ringland Community Centre

Map does not clearly identify the Public Open Space (formal). Map incorrectly labels playing fields as “recreation area”. Reason for designation should also include SINC site and reference to several football pitches and cricket pitch along with equipped playing area.

Map References 3 – Ringland Way Marsh

Reason for designation states ANG. This area is a marsh and inaccessible to the residents of Ringland. ANG designation should be removed but SINC site designation remain.

Map Reference 4 – North of Ringland Circle

Reason for designation incorrectly states “grassed area”.

Should state Wooded and grassed area, small water course (stream) trees (large specimen oaks and other native trees lining route of stream) Public Open Space (informal), wild life corridor part of natural; habitat network and SINC.

Map Reference 6 – Land off Sterndale Bennett Road

Reason for designation incorrectly states “grassed area”.

Should state largely Wooded (over 80%) and grassed area, Public Open Space (informal), orchard and part of natural habitat network and SINC.

Map Reference 8 – Land off Dunstable Road

Reason for designation incorrectly stated “grassed area”.

Should Wooded and grassed area with remnant of semi natural ancient woodland, ancient boundary hedge, Public Open Space (informal), green corridor and part of natural habitat network, trees (several ancient oaks over 200 years old and registered on Woodland Trust ancient tree database) and SINC.

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Ringland Map also incorrectly identifies Ringland Junior School playing field as "recreation" area should be labelled as a playing field.

2. Environmental Spaces Identified in Llanwern

Map Reference 24 – Hartridge Wood Field

Whilst this area is referenced it is not present on the plan. It is also labelled a SINC site but is not present in the Sites of Importance for Nature Conservation (SINC) background paper for the Llanwern Ward. This area has also been identified for housing which contradicts the SINC site status and LDP goal to protect such areas from development.

LDP SINC Site Classification Deficiency

The LDP is deficient in that it does include areas that should be designation as SINC sites. Habitat assessments have not been undertaken for these areas.

Classification taken from Guidelines for the Selection of Wildlife Sites in Wales.

LDP document – Sites of Importance for Nature Conservation (SINC) Deposit Plan 2012

This document does not include important sites in the Ringland ward that qualify on habitat flora and fauna grounds.

Areas missing from Ringland Ward SINC Register.

Remedial Action

Carry out thorough habitat assessments for the areas missing from the SINC site register.

Ringland Top Playing Field

H5 Neutral grassland

H5:1 Lowland Meadow with indicator species:

Primula veris (Cowslips), Ajuga reptans (Bugle), Urtica dioica (Stinging Nettles), Trifolium pratense (red clover), Arrhenatherum elatius (false oats), Holcus lantus (Yorkshire fog), Agrostis capillaris (common bent), Cynosurus Cristatus (crested dog's tail).

S1 Bats: Vital flight and commuting route and priority feeding area attached to roosts for Ringland Top's large colony of bats.

S1 Hedgehog: Site supporting breeding and foraging for large population of hedgehogs.

Land off Sterndale Bennett Road

H5 Neutral grassland

H5:1 Lowland Meadow with indicator species:

Urtica dioica (Stinging Nettles), Trifolium pratense, (red clover), Arrhenatherum elatius (false oats), Holcus lantus (Yorkshire fog), Agrostis capillaris (common bent), Cynosurus Cristatus (crested dog's tail). Ant hills.

H1 Woodland with indicator species:

Bluebells, Anemone nermorsa (wood anemone), Arum maculatum (lords and ladies), green corridor and stepping stone to Hartridge Wood SINC. Part of habitat network of Ringland.

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S1 Hedgehog: Site supporting breeding and foraging for hedgehogs.

S2 Tree Sparrow, Lesser Spotted Woodpecker.

S3 Slow worm: Habitat and breeding ground.

S5 Wood White and Ringlet butterfly. Habitat and breeding ground.

Land off Dunstable Road

H5 Neutral grassland

H5:1 Lowland Meadow with indicator species:

Urtica dioica (Stinging Nettles), Trifolium pratense, (red clover), Arrhenatherum elatius (false oats), Holcus lantus (Yorkshire fog), Agrostis capillaris (common bent), Cynosurus Cristatus (crested dog's tail).

H2 Woodland with indicator species:

Bluebells, Anemone nemorosa (wood anemone), Arum maculatum (lords and ladies), green corridor and stepping stone between Ladyhill Wood SINC and Ringland Wood SINC. Part of habitat network of Ringland. Remnants of Ancient Woodland with several veteran oaks one with girth over 150 inches indicating age in excess of 200 years.

H2:1 Ancient hedge bordering Ringland Junior School playing field.

H2:1 Ancient hedge bordering the back of housing in Dowland Close.

S1 Bats: Vital flight and commuting route and priority feeding area attached to roosts.

S2 Tree Sparrow, House Sparrow, Lesser Spotted Woodpecker.

Land North of Ringland Circle

H5 Neutral grassland with indicator species:

Trifolium pratense, (red clover), Arrhenatherum elatius (false oats), Holcus lantus (Yorkshire fog), Agrostis capillaris (common bent), Cynosurus Cristatus (crested dog's tail). Ant hills.

H12:1 Stream. A fresh water stream traverses the length of the area with adjacent semi-natural habitat and veteran trees.

S5 Dragonflies.

6. A small area is identified a Potential ANG No Access facing the Coldra Roundabout, its slip road and Chepstow Road. This area has no access other than crossing these busy highways. It is inaccessible and has no entry point as it is fenced. It does not qualify as ANG under key element of accessibility.

7. The Ringland Top playing field is identified as ANG. As a playing field it is regularly mown (at least 15 times a year) it does not meet the key elements of Natural Greenspace to be classified as ANG.

8. Land North of Ringland Circle known locally as 19 Hills. This area has large grassed areas that are regularly mown and do not meet the key elements of Natural Greenspace. Only part of this area meets the criteria.

9. Land off Sterndale Bennett Road. Approximately 20% of this area is regularly mown grass and it does not meet the key elements of Natural Greenspace to be classified as ANG.

10. Land off Dunstable Road. Only parts of this area qualifies as ANG as its consists of a large grassed area that is regularly mown and part of it is the amenity area for the flats.

Conclusion

11. The Draft report is totally inaccurate in its assessment of areas of ANG in Ringland. Areas that do not meet the key elements of natural greenspace and the key elements of accessible greenspace have been included. This gives a false impression that Ringland has more ANG than is actually present.

Access Points have been incorrectly mapped. Large areas marked as ANG such as 19 hills and the playing field at Ringland Top off Edward German Crescent are shown with few access points. This

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gives a false impression that these areas are inaccessible. In truth the playing field at Ringland Top is accessible along the 19 Hills is accessible along a large section of Ringland Circle. The land off Dunstable Road is also accessible along Dunstable Road, Hendre Farm Drive and Ringland Circle. The way the access to these areas has been portrayed is in stark contrast to that of the ANG at Kier Hardie Close which shows full access around its perimeter.

The criteria for ANG has not been correctly applied. Areas of grass which are regularly mown are deemed not meet the classification of ANG. Yet such areas as 19 Hills and the playing field at Edward German Crescent and the playing fields at the community centre have been included. This gives false picture as to the amount of real ANG that is available in Ringland.

The LDP is deficient in that the Draft Identification of Accessible & Natural Greenspace in Newport – June 2011 is out of date and totally inaccurate.

Remedial Action:

This report and any conclusions or recommendations drawn from it feeding the LDP need to be removed until such time as an accurate picture of the true ANG in Newport can be prepared. Large areas in Ringland that do not meet the key elements have been included.

Key elements of Natural Greenspace

Natural processes dominate visitor's experience.

Intensity of intervention/management.

Frequently mown grass/amenity area would not be considered to be natural.

Rough and freely growing grassland would be considered natural.

Key elements of Accessible Greenspace

The visitor should be able to access the site either on an unrestricted basis or partially restricted i.e. access is possible at set times of the day.

A distance of 300m or 5-6 minutes walk appears to be the threshold beyond which frequent visits to greenspaces declines. Provision of some form of natural greenspace should therefore be accessible within 300m of the population.

1.Land in Tallis Close is identified as ANG when it has now been tarmacked over for residents parking. The grassed area that is left is an amenity area and regularly mown and does not qualify as natural. It does not meet the key elements of Natural Greenspace to be classified as ANG.

2.Hartridge High School playing field is identified as ANG when it now has Llanwern High School built on it and will have housing built on another part of it. It is also regularly mown and does not meet the key elements of Natural Greenspace.

3.Land at Hartridge farm road is identified as ANG, but is earmarked for housing on the LDP plan.

4. Milton Scholl playing field is identified as Potential ANG NO ACCESS. It is accessed by the staff and pupils of the school as it is their school grounds. It does not qualify as ANG as it is frequently mown and is not natural. It does not meet key elements of Natural Greenspace and it does not meet the key elements of Accessible Greenspace NO ACCESS. It should be removed from the report.

4.The Coldra Roundabout is listed a Potential NO ACCESS. It is possible to access this area. This area is unsuitable as ANG. Its grassed areas are regularly maintained and mown and do not qualify as ANG.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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All of it.

To ensure that the Inspector is aware of all the facts.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness CE2 - Not based on credible evidence base									

3029.D3//H01.57 Williams, Mr Dafydd

P

M

Council Officer: LT

Document: Deposit Plan, p.64

Site: 399/ Hartridge Farm Road

Boundary
Change

Policy: H01.57

Map: Proposals Plan - East H1 (57)

Summary: Proposal for Health Centre on former Social Club and RSPCA dog kennels at Hartridge Farm Road

Item Question	Representation Text	
4 4	The Proposals Map	Yes
9 9	Amend the boundaries of an existing site. H1(57) allocation for housing	Yes
11 11	Site Name Hartridge Farm Road (Part of H1 (57))	
12 12	Site Reference H1 57	
14 14	Representation This site is the logical location of the east Newport Health and Social Care Centre. Its close proximity to the Ringland Estate, good bus route and walking and cycling paths make it ideal. It is also close to a main road for access to the rest of the East of Newport. It would not take up valuable Environmental and Public Open Space. It would not lead to congestion on Ringland Estate roads that were bid out in the 1950's. It would regenerate a brownfield site.	
	Additional Information Submitted - Available on Request	
15 15	Do you want to speak at Public Examination?	Yes
16 16	Subject to speak on at Examination To ensure the Inspector is aware of all the facts.	

Item Question	Soundness Test	
1 1	I think the LDP is sound.	No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3039.D1//SP05	Cabrera, Mr Jose			21/05/2012	<input type="checkbox"/>	E			M	

Council Officer: LT

Document: Deposit Plan, p.18

Policy: SP05

Summary: Support for countryside allocation at Oak Court and Ford Farm, Langstone

Item Question *Representation Text*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Thank you for recently emailing me the Newport Council link concerning the Local Development Plan for 2011 - 2026 in which the following candidate sites are not included.

132.C1 Oak Court, Langstone

1343.C1 Ditto

1400.C1 Ford Farm (larger site) Langstone

1400. C2 ditto (Smaller site)

I would express my sincere thank to your good self including Newport Council for rejecting respective proposals to develop the countryside in question in favour of regeneration schemes which are desperately needed in Newport and indeed for the support of Councillor Atwell whom shares the same views as detailed in his kind email below. I understand the Local Development Plan remains under review until the end of May 2012 if I recall correctly, however, I trust the plan will remain firm and may be subject to only minor amendments.

Sincere thanks and most kind regards.

Tony Cabrera

You may recall our telephone conversation on the 27 January 2012 when you kindly explained the current situation in respect to the prospective residential development of 'green-field land' for Oak Court, which following further investigation on my part may also include the 'green-field' site at Ford Farm. I would also take this opportunity in sincerely thanking you for your time in discussing matters in light of my unannounced telephone call which may have imposed upon other more pressing business engagements planned in your agenda. If you recall I mentioned I would write to Newport City Council Planning Department airing my concerns which are shared by the inhabitants of the village of Langstone, for which I would comment as follows. In doing so please accept my sincere apologies should the content in places concede to emotive script given the subject matter is close to the hearts of most of the villagers residing in Langstone and I would suspect the inhabitants of Newport, who wish to protect the countryside and surrounding villages.

Firstly I would explain that I bought the above property on 27 May 2011 despite the fact I live and work in Amsterdam at the moment, with the view of returning to Newport towards the end of this year, I chose the property on the premise it overlooked the rolling green countryside (to the front and rear) and living in Langstone seemed appealing at the time, which I understand also relates to the views of other villagers who share similar surroundings. However, to my utter dismay (and that of villagers) a parish meeting was convened in Langstone on Sunday 22 January 2012 attended by approximately 300 villagers which addressed issues concerning the prospective Oak Court residential development comprising in excess of 200 dwellings, a doctor's surgery and a convenience store etc., which would occupy the agricultural land running alongside the A48 immediately in front of my property and the properties of many other villagers. Unfortunately I did not attend the meeting given I was not informed and neither was Miss Steffi Bergmann residing in my property. I imagine far more people living in the village would have attended (myself included) had the meeting been announced correctly. You will appreciate having searched for a property for almost 2 years prior to purchasing Braeside involved protracted research as relative to flooding, subsidence, mines, appeal, local amenities and potential developments in surrounding areas etc., and it came as a complete shock to be informed of the prospective residential development for Oak Court and potentially Ford Farm (both green-field sites), in light of the fact prior to purchase, Newport City Council Planning

Department informed me no sites or indeed the highway had been earmarked for development/ improvement in front of or to the rear of my property. It also transpires, commencing August/ September 2011 the respective stretch of road running alongside the entire length of the proposed Oak Court development underwent substantial alteration as relative to providing a wide pavement over the applicable length of highway, which I have been informed barely receives any pedestrian traffic, as concurred by one of the Council's Planning Officers prior to my call to your good-self on 27 January 2012. This would therefore appear to be at odds with the fact no development was planned at the time for Oak Court. Needless to say, had I known about these prospective residential development(s) I would most certainly not have purchased a property in Langstone, which may be reflected in other peoples views should the development(s) go ahead. You will also appreciate that local planning and matters relating to the environment are very complicated and diverse subjects, and unlike your good-self, the majority of people have little knowledge or expertise as relative to the 'whole picture' concerning Newport and surrounding areas. However, in an attempt to express my concerns and those of fellow villagers, I have reviewed elements of Newport City Council's planning policy and I must say it would appear well balanced and a most interesting read, encompassing the requirements of both the city and its surroundings as well as addressing the interests of the inhabitants in the area. I would go as far as to say, should nothing good come of this letter in regard to declining respective housing schemes in Langstone, at least I have pride in supporting Newport City Council's commitment and endeavours to conserve the countryside and provide a good location for people to live in

and enjoy. As such, I would be most grateful should you give consideration to the following points in respect to the concerns shared by the villagers of Langstone as relative to the prospective housing schemes, with anticipation that Newport City Council will decline approval to allow the development of both (and other similar) sites in Langstone and corresponding inclusion in the forthcoming Local Development Plan. I understand the above developments are officially named potential Candidate Sites as follows:

- 132.C1: Oak Court Langstone.

- 1343.C1: ditto.

- 1400.C1: Ford Farm (Larger site), Langstone.

- 1400.C2: Ford Farm (Smaller site), Langstone.

Sustainability

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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• Sizable increase in population and corresponding housing developments in Langstone will inevitably involve construction on green-field sites as is the point in case concerning Oak Court and Ford Farm. As such, respective requests for planning permission are not conducive to sustainability and would only serve to undermine Council policy and also the consensus amongst the city of Newport and surrounding areas. Furthermore, the prospective residential schemes may burden Newport City Council in unnecessary infrastructure costs relating to e.g. highway improvements and other facilities such as larger schools which may only benefit the village and not Newport as a whole where the contrary would be the case should more urban brown-field sites be regenerated. Newport has many brown-field sites (some very large from the decline of previous industries e.g. the steelworks at Llanwern that I understand would accommodate approximately 5000 dwellings) which would benefit from regeneration and would contribute towards meeting the demands of growth as relative to commercial, residential, leisure and public facilities etc. for the impending update of the Local Development Plan. Surely careful regeneration of these areas would benefit the entire city of Newport and its surroundings, as opposed to conceding to the pressures imposed by developers to deplete green-field stock to the detriment of the countryside and those that live in it, which would benefit only the few concerned, As would be the case with the Langstone developments and potentially other villages facing the same plight, indeed developers and the general public should seek to protect and conserve the natural environment and not jump at the chance of exploiting it for their own desires causing irreversible and wilful damage/ destruction. There is no doubt said brown-field sites urgently require redevelopment in order for Newport to prosper as a city. Furthermore, many of these areas are suitably located to take advantage of existing facilities e.g. infrastructure, public transport and schools etc., which may be amplified for the benefit and enjoyment of all residents of Newport. This may also encourage new business and migration into the city. Currently respective brown-field sites serve to blot the landscape and may give an impression to prospective businesses and inhabitants that the city of Newport is in decline. Effectively, money invested in these areas would improve the aesthetics of the city and encourage growth in all aspects and also improve the quality of life for Newport and surrounding inhabitants as a whole, as opposed to only a select few should Newport City Council allow selective construction in areas at the periphery of the city. Furthermore, developing brown-field sites would also conserve areas with green-field and rural status, and reduce pressures to build in the countryside which would also reduce travel by car and encourage travel by foot, cycling and public transport thus contributing to the concept of sustainability as endorsed by Newport City Council's planning policy. Essentially Newport city requires focused investment in order to benefit the entire community instead of allowing selective enterprise at the periphery of the city for exploitation of green-field sites which offer easy pickings to developers yet marginal benefit and enjoyment to the community. With all due respect to developers wishing to construct on green-field sites, in most instances respective areas offer substantial financial reward which in the case of Langstone may provide quick sales and increased revenues given the area may be considered as desirable, and may also support higher selling prices. It is common knowledge development costs in respect to green-field sites are in most cases reduced, given little if any ground preparatory work is required, where there is also no requirement to demolish existing structures and foundations, as would predominantly be the case when developing brown-field sites. Hence the increased interest in developing green-field sites as opposed to the regeneration of brown-field areas. I am also convinced developers do not entirely consider the needs of respective villages or their inhabitants on an individual basis or indeed understand the concept of village life. As relative to the prospective residential scheme for Oak Court in Langstone, I understand the developer may be Sir Robert McAlpine who as a national house builder will no doubt see fit to incorporate standard 'off the shelf housing designs' to blot the landscape in numbers, which will not contribute to the aesthetics of the village and possibly serves to encourage its demise. I for one would be encouraged to sell my property to avoid the protracted noise during construction, erosion of the countryside and the undesirable prospect of increased traffic spilling onto the A48 and associated increase in unpleasant noise and pollution. Unfortunately other villagers may be encouraged to leave Langstone too, which may have undesirable consequences in so far as reducing the selling prices of existing properties and fragmenting village community spirit. In this respect would there be entitlement to financial compensation for villagers seeking to leave Langstone as a consequence of the intrusive developments. Employment in the Village With all due respect to the developer(s), very few jobs will be created in the village as a result of either or both housing schemes. Furthermore, the construction business by its very nature (and in most cases) offers transient employment through more often than not a mobile workforce and not necessarily from the county of Gwent or city of Newport. As was the case with the recent construction of the new Severn Power Combined Cycle Gas Turbine Power Station in Nash. Yes, the respective workforce contributes to the local economy however, when works are complete most if not all vacate the area entirely, contributing little to the permanent stability of the area or businesses as would be the case in point for Langstone. I understand the developer's intention is to provide a surgery and a convenience store. However in reality none of these are required, given there are sufficient surgeries to accommodate the village in the immediate surroundings and a more than adequate convenience store provided by the local garage whose trade may be adversely affected as a consequent of the provision of a further and unnecessary store which would seem unfair having made concerted efforts to provide the community with a most friendly and appreciated service. In addition, most villagers do their weekly shopping at the larger stores (e.g. Tesco and Morrisons etc.) where there is a larger choice with products at cheaper prices.

Traffic

Given very little employment will be created in the village of Langstone resulting from respective housing schemes including the proposed development at nearby Catsash, most of the newcomers to the village will seek to work outside of the village. I understand the Oak Court and Catsash schemes alone comprise 200 and 50 new dwellings respectively which based on an average family of 2.5 and taking into consideration public transport, may result in an additional 300 to 400 cars (more again should the Ford Farm go ahead) joining the A48 at peak times each day, namely early morning and in the evening. This would also serve to challenge Newport City Council's planning policy in respect to reducing travel by car in favour of walking, cycling or opting for public transport. Furthermore, the anticipated traffic would increase undesirable road noise and emissions to the detriment of the local environment and potentially contribute towards climate change. Moreover, surrounding highways including the A48 and M4 already suffer from heavy congestion at peak hours and would not benefit from the additional transit generated by Oak Court and Ford Farm developments. Further traffic calming may be required in Langstone involving traffic signs, speed ramps and possibly additional cameras all at unnecessary additional cost to be funded through taxes.

The recreational activities of the increased population of Langstone would also add further burden upon highways with private car usage which are already stretched to capacity during peak times given village activities may be considered as limited, especially by the younger generation, adding further noise and pollution to the environment.

• Whilst walking into town from Langstone may be considered by many as an adventure/ feat in itself given the distance involved, cycling is not a safe option due to the lack of a dedicated cycle paths which not only applies to the length of highway running alongside the Oak Court development. In addition, traversing the M4 junction 24 roundabout poses a danger in itself. This comes from personal

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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experience and would surely present a challenge to the unaware child or indeed adult and may even lead to accidents, some fatal.

- The Coldra roundabout can hardly be considered suitable for the increased traffic which would particularly suffer at peak times and may require amplification to meet increased traffic at expense to Newport City Council and tax payers.

- In low light conditions e.g. during the evening/ night, the number of cars exiting the prospective developments (especially that of Oak Court) may give rise to a situation where headlamps illuminate property frontages running along the A48 immediately in front of the developments, which may be considered intrusive and irritating by respective owners who are currently not exposed to such interferences.

- The increase in number of students travelling to schools and colleges etc. would also place an additional demand on highways, especially families opting to take their children to school via private cars which appears to be the trend nowadays. infrastructure and facilities

- Water supplies, sewers, power, highways may all need to be upgraded to serve Oak Court and Ford Farm developments, the costs of which would most probably be apportioned amongst the Developer, Council and respective utility companies. In addition the developments may involve Newport City Council in unnecessary costs as relative to the potential expansion of the only local primary school in the village. In the main, said improvements and additional costs may only improve the quality of life to the respective few. Were the Developer to provide housing in the city's brown-fields sites, some of which are substantially larger in size and would significantly contribute to accommodating far more residents, respective improvements may benefit a far greater audience including existing city residents, especially concerning improvements in highways and the like.

Quality of Life

- I understand from villagers there is no need for the residential developments at Oak Court and Ford Farm as relative to village requirements. Villagers want to retain the countryside within the footprints of the prospective residential schemes whose development would only serve to detract from their feeling of well being and also their quality of life. Furthermore, there is no need to destroy the countryside which provides a setting for the village of Langstone and Newport. In contrast and in this instance, it would appear respective developers have absolute disregard for the countryside and the pleasures gained by all in respect to its beauty, and instead glare at it with glazed eyes in contemplation of exploitation and financial gain. The potential scale of the additional schemes would also be considered as intrusive in matters concerning the village and its inhabitants. Indeed it is difficult to ascertain any need arising from housing schemes in the village of such scale which necessitate a requirement to destroy and develop on irreplaceable countryside.

- In light of the fewer facilities on offer in Langstone and surrounding areas, and taking into consideration any proposed improvements resulting from respective developments, imposing additional housing upon the village of Langstone in the numbers proposed is unlikely to increase the quality of life for existing inhabitants or indeed newcomers. On the contrary, the irritation of increased traffic accompanied by corresponding increases in road noise and pollution, coupled with the wilful destruction of irreplaceable countryside will only serve to drive away many of the existing population, possibly to be replaced by residents who have no regard to village life or indeed the countryside, which d can already be seen in up and coming younger generations. Increased traffic also reduces the quality of life of village inhabitants.

- Whilst I am sure the village of Langstone would embrace residential developments of moderate size and number (possibly referred to by some as piecemeal development) such as to provide homes to people who wish to return to Langstone, the developments at Catsash and Oak Court alone would increase the population by approximately 625 when indeed the current population is in the order of 3900 people, representing a considerable increase of 16%. This does not take account of any sizeable increase in population posed by the prospective development of Ford Farm etc. Essentially the developments are too large and inappropriate for the village. I am more than confident those wishing to return to live in Langstone would do so primarily to enjoy the aspects of village life with which they were previously accustomed and would not wish to be associated in having encouraged or participated in large developments such as Oak Court or Ford Farm including the erosion of countryside which provides a vital landscape setting to everybody. Respective residential developments of the size intended detract from the qualities expected of village life and also serve to undermine close knit communities for which village life is associated, which will be completely changed with ^ no guarantee for the better. I am also convinced that should Newport City Council sanction such housing developments, this would encourage similar schemes with undesirable consequences to Langstone as a small 'village' and Newport generally, both in the knowledge that few villages would be protected from unfavourable, unnecessary and insensitive expansion. The countryside should be conserved for future generations to enjoy and should not be considered an expendable commodity.

- In reference to the geographical location of Langstone as relative to Newport city centre and other areas which may offer employment, said developments at Langstone are also not conducive to supporting affordable housing for families and individuals with low incomes who may struggle to afford private transport and who cannot rely upon public transport in its current state or indeed afford corresponding fares. In addition, any proposed convenience store would provide basic consumables at higher prices than larger food chain stores closer to the centre of Newport city. This situation would appear to be in conflict with Newport City Council's planning policy as relative to new residential developments catering for affordable housing for which the circumstances detailed above would unfairly discriminate against families with low incomes who may find it costly and impractical as relative to mobility. With this in mind, it is most evident both residential schemes would benefit from being located closer to the centre of the city of Newport taking advantage of its existing facilities and infrastructure and encouraging the regeneration of brown-field sites with the prospect of greater opportunities in maintaining employment whilst complying with the ethos prescribed in Newport City Council's planning policy. The inhabitants of Langstone (myself included) completely understand the pressures imposed upon Newport City Council by respective parties wishing to have plots of land incorporated into the impending revision of the Local Development Plan for impending construction, for which the efforts involved in defining respective policy including classification of land use alone would be considered by most as very complicated and very demanding, if not daunting task. However in such cases (unless prevailing circumstances dictate to the contrary leaving no alternative), the inhabitants of Langstone, and I am sure Newport and surrounding villages, would encourage W Newport City Council to resist requests to develop green-field sites and the countryside in the interest of the entire community. Furthermore, it has been our experience that Newport City Council is firm, fair and most responsible when dealing with issues concerning planning and the environment, undertaking to provide for the community of Newport and its surroundings as a whole rather than concede to the desires of individual parties whose endeavours may solely be focused on financial gain. With this in mind, the inhabitants of Langstone have absolute confidence in Newport City Council declining

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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respective planning approvals in relation to the prospective developments for Oak Court and Ford Farm in the village of Langstone, as has been the case in the past. We would also sincerely anticipate Newport City Council adheres to its planning ethos (endorsed by the inhabitants of Newport) encouraging the regeneration of brown-field sites as opposed to depleting green-field areas which would involve irreversible and detrimental impact upon the environment and countryside. On a personal note, I sincerely thank you for taking time to read this letter and would apologise for its length. I also realise planning can at times be a controversial subject and that it may not be an easy task determining a favourable outcome to all concerned. I sincerely hope other villagers in Langstone express their concerns to Newport City Council formally and in writing etc. regarding the prospective developments for which no doubt you will give due consideration, given it would appear just in allowing the community to have a hand in forging development in its village, whom feel privileged to live in Langstone. However, I sadly fear this may not be the case given I understand previous attempts have already been made in the past to gain planning approval to construct on the land in question which were sensibly declined by Newport City Council for flying in the face of planning policy and maybe villagers feel too confident the same will happen again as relative to recent applications to develop the land who will only have themselves to blame should permission be granted. Furthermore, many villagers may not be in a position to communicate or express themselves for whatever reason e.g. old age etc., therefore true numbers opposing the developments may not be reflected in correspondence received by Newport City Council to-date.

On a separate note, would it be possible to explain events and corresponding timetables to the village in respect to awarding or declining planning approval for the developments at Oak Court and Ford Farm and should an unfortunate award be granted, corresponding timetables for construction, the type(s) of housing envisaged etc. and exact numbers including the cross-section of people respective developments would cater for, such that we may further gauge impact upon the village and the timescale for corresponding action.

Following my letter dated 01 February 2012 concerning the above subject which was actually emailed to you on 31 January 2012 in respect to the potential residential developments of the following Candidate Sites:

132.C1: Oak Court Langstone.

1343.C1 ditto.

1400.C1 Ford Farm (Larger site), Langstone.

1400.C2 Ford Farm (Smaller site), Langstone.

I also wanted to mention that granting planning permission to develop the above countryside areas, which would also apply to other green-field sites in the Newport area, whether in urban, semi-urban or rural locations, may serve in setting a precedence to promote future schemes of the same kind detracting from the advantages of brown-field regeneration, given the former may be more attractive to the developer for reasons stated in my previous letter.

This would also undermine Newport City Council's planning policy and detract from established concepts of sustainability and conservation which despite the obvious, as relative to the depletion of attractive green-field areas including the countryside, may also lead to undesirable consequences in so far as (but not limited to) the degradation and decline of Newport city as a consequence of under development of large brown-field areas, leading to reduced prospects and furthermore bolstering unemployment to the detriment of the area and its inhabitants. would express my sincere thanks should you give these points your consideration

15	15	Do you want to speak at Public Examination?	Neither
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	Neither
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Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3042.D1//SP05	Anderton, Mr Paul			15/04/2012	<input type="checkbox"/>	E	C		M	

Council Officer: LT

Document: Deposit Plan, p.18

Policy: SP05

Summary: Support for countryside allocation on land north of A48 at Langstone

Item Question Representation Text

14 14 Representation

Dear Ms Taylor

Thank you for your email.

Could it be noted please that I object to any proposal by a developer or anyone else to include any part of the land north of the A48 in Langstone in the LDP as a candidate site for future housing or other development. No green field sites should be developed until all brown field sites in the City are developed first.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3046.D11/CE05	Ringland Wood & Wildlife Conservation Group			19/06/2012	<input type="checkbox"/>	P	O			

Document: Deposit Plan, p.49

Policy: CE05

Summary: Remove paragraph (iii) from Policy CE5

Item	Question	Representation Text	Soundness Test
2	2	Policy Number CE5	
3	3	Paragraph or section number(s) (iii)	
7	7	A new paragraph or new text.	Yes
14	14	Representation Remove the following text from (iii) 'UNLESS IT CAN BE DEMONSTRATED THAT THERE IS AN EXCESS OF PROVISION OR FACILITIES CAN BE ENHANCED THROUGH DEVELOPMENT OF A SMALL PART OF THE SITE.' REASONS:- This statement opens up loss of environmental space 'IN AND ADJOINING THE URBAN AND VILLAGE AREAS,' which contradicts and conflicts with the following sections of the LDP:- 1/ Overview 0.9 'Protection of Green Spaces...'. 2/.SP1 (ix) 'CONSERVING, ENHANCING AND LINKING GREEN INFRASTRUCURE...'. 3/. SP2 section 2.18 'Climbing Higher'22 is the Welsh Government's long term strategy for an active, healthy and inclusive Wales. Through providing a network of sustainable facilities and open spaces'. 4/. SP2 section 2.19 '....For example, tight settlement boundaries and green infrastructure encouragement'.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3046.D2/1.10/Evol	Ringland Wood & Wildlife Conservation Group			19/06/2012	<input type="checkbox"/>	P	O			

Document: Deposit Plan, p.5, para.1.10

Site: 199/1654.C1 Airport

Policy: Evolving Newport

Summary: To remove the text within paragraph 1.10

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
3	3	Paragraph or section number(s) 1.10	
7	7	A new paragraph or new text.	Yes
14	14	Representation Remove the following text from 1.10 'A potential airport in the Severn Estuary was also raised, but as approval of this is beyond the Council's jurisdiction, and as the proposal does not feature in any government plan or strategy, it is not considered further in this plan'. REASONS:- 1/. The Sustainability Appraisal Report overall comparison against objectives gives an average of 'A3 Not Support the Concept of an Airport'. Therefore no mention of the Airport should be made in the LDP. 2/. The Candidate Sites representation 1654.C1 is incorrectly completed and does not truthfully reflect on the negative impact the Airport proposal would have on the local environment, the health and well being of local residents due to noise and air pollution and the loss of or irreversible damage to protected natural landscape and RAMSAR sites. The proposer, Charles Peter Greed, is the Director of a now dissolved company 'SEVERNSIDE INTERNATIONAL AIRPORT LIMITED' and therefore has no real business case for proposing such an unrealistic scheme.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3047.D11/SP10	Brinsons Fairfax	Asbri Planning		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.21

Site:

Policy: SP10

Map: Inset 2: Marshfield and Castleton Village Boundary

Summary: Objection over the restriction of brownfield led strategy

Item Question Representation Text

2 2 Policy Number
SP10

11 11 Site Name
Marshfield Road, Marshfield

14 14 Representation

Policy SP10 – House Building Requirement, is objected to as the 'brownfield' led strategy in restricting appropriate levels of development in sustainable settlements such as Marshfield/Castleton, does not provide for a sufficient range and choice of housing. This point is expanded upon in the objections to Policy H1.

The Proposals Map is also objected to on the above basis.

The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
To put the case forward for the site's inclusion and to present evidence directly before the Inspector.

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2, CE4

Item Question

Tick-box reply

8 8 Add a new site. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3047.D2//SP05	Brinsons Fairfax	Asbri Planning		03/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.18

Site: 382/ 64 Marshfield Road

Boundary Change

Policy: SP05

Summary: Inclusion of site within Settlement boundary of LDP for housing development purposes.

Item Question Representation Text

2 2 Policy Number
SP5

4 4 The Proposals Map

Yes

5 5 Inset Plan(s)

Yes

14 14 Representation

The site is occupied by a single dwelling with adjoining paddock land. It is bounded by Marshfield Road and existing residential development on two sides and the site's eastern boundary does not extend development beyond that which already exists. As such the inclusion of the site beyond the settlement boundaries shown is inappropriate given the site's characteristics and its degree of containment and firm boundary to the north, in form of a distinctive belt of vegetation.

The above has been previously recognised by the Council by the site's inclusion within the UDP settlement boundary.

The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

To put the case forward for the site's inclusion and to present evidence directly before the Inspector.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness
CE2, CE4

Item Question

Tick-box reply

8 8 Add a new site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3047.D3//SP08	Brinsons Fairfax	Asbri Planning		03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.20

Site: 383/ 64 Marshfield Road

Boundary
Change

Policy: SP08

Summary: Objection to the Policy SP8 (Special Landscape) due to its contained nature.

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number SP8		
4	4	The Proposals Map		Yes
5	5	Inset Plan(s)		Yes
14	14	Representation Policy SP8 - Special Landscape Areas is objected to. Whilst Policy SP8 does not necessarily preclude development from taking place, subject to the design being of a high quality, the Policy is nevertheless objected to on the grounds that the contained nature of the site separates it from wider areas of open countryside to the east, where the SLA designation is more appropriate in being applied to the distinctive character of the Wentlooge Levels and land to the north which rises to the A48 and M4 corridors. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site. Additional Information Submitted - Available on Request		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness CE2, CE4		
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3047.D4/H01	Brinsons Fairfax	Asbri Planning		03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.62

Site: 324/ Land at 64 Marshfield Road

New Site

Policy: H01

Summary: Objection to the Policy H1 (Housing Sites) on the grounds that appropriate allocations and/or revisions to settlement boundaries should be made including land at 64 Marshfield Rd

Item	Question	Representation Text	Yes
2	2	Policy Number H1	
4	4	The Proposals Map	Yes
5	5	Inset Plan(s)	Yes
14	14	Representation	

Policy H1 is objected to on the grounds that appropriate allocations and/or revisions to settlement boundaries should be made in order to maintain a range and choice of appropriate housing land opportunities in larger villages outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right, including Marshfield/Castleton.

The Proposals Map is also objected to on the above basis.

The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.

5.0 HOUSING POLICIES

5.1 We do not dispute the need for development on previously developed land in sustainable locations where existing and proposed forms of development can contribute positively to enhancing the image of the new City. Selective releases will be required, however, in order to maximise housing land opportunities. These will need to include relatively small sites where appropriate forms of development can be accommodated which reflect the existing settlement pattern of the surrounding villages and where development can be accommodated which would not represent a major intrusion into the surrounding countryside.

5.2 On the edge of the City and its 'satellite' settlements such as Marshfield/Castleton, in order to maintain a range and choice of appropriate housing land opportunities, there will be a continuing need to include relatively small sites where appropriate forms of development can be accommodated which reflect the existing settlement pattern of the area and where development would not represent an intrusion into the surrounding countryside.

5.3 Whilst Marshfield is a village outside the main urban area of Newport, there is no specific reference in the Plan to the larger settlements outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right.

5.4 In the above context, Marshfield, as part of the linked settlement with Castleton, merits such consideration. The Ward has a population of over 4,000, approximately 3,000 of which live in the two villages.

5.5 'Cluster' settlements which combined have a sustainable range of facilities are regarded as 'sustainable settlements' in various Local Development Plans in Wales and provision for appropriate growth is made. For this reason Policy H1 is objected to on the grounds that specific provision, either by specific site allocations or by favouring amendments to the settlement boundaries for a sustainable mix of housing should be identified in Marshfield/Castleton.

2

5.6 In the context of the above, supporting paragraph 5.9 refers to the likely contribution from small sites, whilst 5.10 refers to an allowance of 50 units a year which are estimated to come forward as part of a 'windfall allowance' for infill and windfall sites. With urban and settlement boundaries remaining as they were from the Unitary Development Plan, 4 such figures are unlikely to be realised given the number of windfall sites already associated with large brownfield releases.

Additional Information Submitted - Available on Request

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3047.D5/4.7.12/SP	Brinsons Fairfax	Asbri Planning		03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.19, para.4.7.12

Site: 384/ 64 Marshfield Road

Boundary Change

Policy: SP07

Summary: Objection to Green Wedge as it contrasts to the PPW definition.

Item Question	Representation Text	Soundness Test
2 2	Policy Number SP7	
4 4	The Proposals Map	Yes
5 5	Inset Plan(s)	Yes
14 14	Representation Planning Policy Wales (PPW) - Edition 4, Feb 2011, suggests that green wedge policies and boundaries should be reviewed as part of the Development Plan review process. At paragraph 4.7.12 PPW states that: "In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries. Green wedges policies should be reviewed as part of the development plan review process." PPW makes it clear that only land that is strictly necessary to fulfil the purpose should be included within a green wedge and that clearly identifiable features should be used to establish 'defensible boundaries'. It is clear that the site within a proposed green wedge is contrary to the above as its development would not prejudice the gap which exists between Newport and Marshfield as it would not extend further to the east of existing residential cartilages. On this basis Policy SP7 is objected to. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site. Additional Information Submitted - Available on Request	
15 15	Do you want to speak at Public Examination?	Yes
16 16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness CE2, CE4	

Item Question

Tick-box reply

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
8 8	Add a new site.		Yes							

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3048.D1//H15.02	Celtic Recycling			28/05/2012	<input type="checkbox"/>	W	O		M	
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Petition of 95 signatures

Additional material submitted

Council Officer: LT

Document: Deposit Plan, p.H15 -1771

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Proposals Plan - East H15 (ii)

Summary: Remove allocation of H15 ii Queensway Meadow Site for Gypsy and Traveller transit accommodation

Item	Question	Representation Text
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2	2	Policy Number
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5 - housing

3	3	Paragraph or section number(s)
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H15 (ii)

4	4	The Proposals Map
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Proposals Map

14	14	Representation
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First of all, I would like to state that I am in complete agreement that suitable areas must be found for housing gypsies and travellers, however identifying a site next to one of Newport's main commercial and industrial areas has obviously been decided without any thought for any businesses in the area. We as a company, have invested £5m into a development at Queensway Meadows the like of which is probably unrivalled in the UK, possibly Europe. The facility will enable us to showcase Newport as an area that can cope with the demands of a highly regulated industry. More importantly, the growth of the business has meant us creating over 25 jobs in the area in the last twelve months. We have been awarded major contracts that demands employment growth of another 40-60 jobs within the next 12-18 months. However, our major clients like National Grid, Western Power Distribution etc will certainly re-think their strategy in allowing us to store brand new heavy electrical equipment when there is a perceived risk of theft or tampering with their equipment. I recently presented a petition against the proposed Queensway Meadows Site and current 'tolerated' site granted by the Welsh Assembly Government to local councillors. The petition had just short of 100 separate signatures from different businesses located within Queensway Meadows, Leeway and Spytty Retail Park. Everyone in the area is completely against the plan to site gypsies and travellers anywhere near their businesses and livelihoods. With regards to the tests of soundness, I would say that the following have yet to be met: P1 - Community Involvement Scheme? At what point did any business in the area receive written information regarding identification of the Queensway Meadows site? If we had known about this decision, I can assure you that we would have invested in our Barnsley Site rather than Newport. The level of opposition would have been astounding (as it is at the moment). C1 - I'm assuming that all the empty units around the estate is part of a plan to regenerate business in the area and attract growth and investment? No company will invest in the area knowing that they would be a stone's throw away from a gypsy and traveller site. C4 - As above. There has been no regard whatsoever to the feelings and requirements of commercial and residential properties around Queensway Meadows. CE2 - Due to there being a complete lack of consultation in the whole process, we have never had the chance to discuss or review the 'relevant alternatives' to the Queensway Meadows site. Anyone who thinks that placing a gypsy and traveller site next to an industrial estate really has no idea of the potential consequences it would have on the area. As an example, our valuers have already stated that it is not unreasonable to assume the value of our business has halved since the temporary site opposite our premises has been occupied by gypsies and travellers. I would say that this could go for all other properties in the area. We have cancelled our grand opening ceremony and have also placed a hold on further development and employment until this incredulous matter has been resolved.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	No
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No

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness P1, C1, C4 and CE2									
	<i>Item Question</i>									
10 10	Delete an existing site.									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3048.D2//H17	Celtic Recycling				<input type="checkbox"/>	W	O	W	M	
Petition of 95 signatures		Additional material submitted								
			Council Officer: LT							

Document: Deposit Plan, p.72

Policy: H17

Map: Proposals Plan - East H17

Summary: Request deletion of Gypsy and Traveller Allocation at Queensway Meadows

Item	Question	Representation Text
2 2	Policy Number	H17
4 4	The Proposals Map	
14 14	Representation	<p>First of all, I would like to state that I am in complete agreement that suitable areas must be found for housing gypsies and travellers, however identifying a site next to one of Newport's main commercial and industrial areas has obviously been decided without any thought for any businesses in the area. We as a company, have invested £5m into a development at Queensway Meadows the like of which is probably unrivalled in the UK, possibly Europe. The facility will enable us to showcase Newport as an area that can cope with the demands of a highly regulated industry. More importantly, the growth of the business has meant us creating over 25 jobs in the area in the last twelve months. We have been awarded major contracts that demands employment growth of another 40-60 jobs within the next 12-18 months. However, our major clients like National Grid, Western Power Distribution etc will certainly re-think their strategy in allowing us to store brand new heavy electrical equipment when there is a perceived risk of theft or tampering with their equipment. I recently presented a petition against the proposed Queensway Meadows Site and current 'tolerated' site granted by the Welsh Assembly Government to local councillors. The petition had just short of 100 separate signatures from different businesses located within Queensway Meadows, Leeway and Spytty Retail Park. Everyone in the area is completely against the plan to site gypsies and travellers anywhere near their businesses and livelihoods. With regards to the tests of soundness, I would say that the following have yet to be met: P1 - Community Involvement Scheme? At what point did any business in the area receive written information regarding identification of the Queensway Meadows site? If we had known about this decision, I can assure you that we would have invested in our Barnsley Site rather than Newport. The level of opposition would have been astounding (as it is at the moment). C1 - I'm assuming that all the empty units around the estate is part of a plan to regenerate business in the area and attract growth and investment? No company will invest in the area knowing that they would be a stone's throw away from a gypsy and traveller site. C4 - As above. There has been no regard whatsoever to the feelings and requirements of commercial and residential properties around Queensway Meadows. CE2 - Due to there being a complete lack of consultation in the whole process, we have never had the chance to discuss or review the 'relevant alternatives' to the Queensway Meadows site. Anyone who thinks that placing a gypsy and traveller site next to an industrial estate really has no idea of the potential consequences it would have on the area. As an example, our valuers have already stated that it is not unreasonable to assume the value of our business has halved since the temporary site opposite our premises has been occupied by gypsies and travellers. I would say that this could go for all other properties in the area. We have cancelled our grand opening ceremony and have also placed a hold on further development and employment until this incredulous matter has been resolved.</p>

Additional Information Submitted - Available on Request

15 15	Do you want to speak at Public Examination?	No
Item	Question	Soundness Test
1 1	I think the LDP is sound.	No
13 13	Test of Soundness	P1,, C1, C4 and CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
10 10	Delete an existing site.									

3070.D1//CE02 Woodland Amenities (Rogerstone) Ltd., 08/06/2012 E C M

Council Officer: LT

Document:Deposit Plan, p.47

Policy: CE02

Summary: Clarifying no connection to R.E. Phillips and Partners or any other company and reject that they own the land referred to in 2073.C1 and C2

Item Question Representation Text

14 14 Representation

Further to my earlier e-mail, although in the light of your clarification the matter is academic, I would wish to state absolutely that our Company has no connection with any other Company and that includes R.E.Phillips and Partners. I note on their candidate site applications 2073.C1 and C2 that they state that the proposer is the owner of the site. This is totally untrue in respect of the larger area in both applications.
Thought I would clarify that.

A couple of months ago, I sent you (The City Planning Dept.,) an e-mail to the effect that it had been brought to our notice that Reg. Phillips and Partners/Llanover Estates, had put our land forward as suitable for development with a small patch of land that they own known as the old Ty Melyn allotment site. I made it clear in that e-mail that this had been done without or knowledge, permission or agreement and that we had nothing to do with them. They would appear to be using our nine acres of land to enhance their own small patch to make it look more suitable for development. I also told you in that e-mail that we had refused Reg.Phillips and Partners permission to carry out an ecological survey of our land in 2010/11 and made this clear to them in writing. Our land was declared a S.I.N.C in 2011 and I met with your own biodiversity officer, Katie Godfrey in July 2011 and we walked the land together and had an in depth discussion about it. The City Planning Dept., have always maintained that our land is regarded as green wedge between Newport and Caerphilly authority areas. I have a letter from your own Emyr Davies dated 6 October 2010 to this effect and clearly stating that 'development within this land will be rigorously restricted in order to protect the open nature of the land'.
It therefore concerns us that the old Ty Melyn site may be developed and that this would have a detrimental effect on our land.

I would wish to state absolutely that our Company has no connection with any other Company and that includes R.E Phillips and Partners. I note on their candidate site applications 2073.C1 and C2 that they state that the proposer is the owner of the site. This is totally untrue in respect of the larger area in both applications.

15 15 Do you want to speak at Public Examination? Neither

Item Question Soundness Test

1 1 I think the LDP is sound. Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3073.D1//H16.02	Netherway, Mr Ian			24/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to the allocation of Former Army Barracks at Pye Corner for Gypsy and Traveller Accommodation

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-

- 1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided.
 - 2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.
 - 3) WAG guidelines state that sites should not be in a flood plain.
 - 4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would likev to point out there is no street lighting on Broadstreet Common or pavements to reach infastructure.
 - 6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infastructure.
- These are my objections, please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3073.D2//H16.03	Netherway, Mr Ian			24/05/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to the allocation of the Former Army Camp Site at Pye Corner for Gypsy and Traveller Accommodation

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-
 1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided.

2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.

3) WAG guidelines state that sites should not be in a flood plain.

4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.

5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach infrastructure.

6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infrastructure.

These are my objections, please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3073.D3//H17	Netherway, Mr Ian			24/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to Policy H17 content

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-
 1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided.

2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.

3) WAG guidelines state that sites should not be in a flood plain.

4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.

5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would likev to point out there is no street lighting on Broadstreet Common or pavements to reach infastructure.

6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infastructure.

These are my objections, please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3073.D4//H15.02	Netherway, Mr Ian			24/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to allocation of Queensway Meadows transit site under policy H15

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-

- 1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided.
 - 2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.
 - 3) WAG guidelines state that sites should not be in a flood plain.
 - 4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would likev to point out there is no street lighting on Broadstreet Common or pavements to reach infastructure.
 - 6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infastructure.
- These are my objections, please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3074.D1//SP10	Jones, Mr Stephen	Asbri Planning		24/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.21

Policy: SP10

Summary: Objection to Policy SP10 on grounds that more range and choice is required so that alternative site can be allocated.

Item Question Representation Text

2 2 Policy Number
SP10

14 14 Representation

Policy SP10 - House building requirement, is objected to as the brownfield led strategy in restricting appropriate levels of development in sustainable settlements such as Marshfield/ Castleton, does not provide for a sufficient range and choice of housing.

The reasons are expanded on in representations relating to Polcy H1. the accompanying Submission Document also refers and included a Sustainability Appraisal for the Alternative site.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
to put the case forward for the site's inclusion and to present evidence directly before the Inspector.

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2, CE4

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3074.D2//H01	Jones, Mr Stephen	Asbri Planning		24/05/2012	<input type="checkbox"/>	P	O		M	
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Additional material submitted

SA/SEA submitted

Council Officer: LT

Document: Deposit Plan, p.62

Site: 326/ Ty Mawr Lane

New Site

Policy: H01

Summary: To include new site at Ty Mawr Lane

Item	Question	Representation	Text
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4	4	The Proposals Map	Yes
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5	5	Inset Plan(s)	
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Marshfield

11	11	Site Name	
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Ty Mawr Lane, Marshfield

14	14	Representation	
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Policy H1 is objected to on the grounds that appropriate allocations and /or revisions to settlement boundaries should be made in order to maintain a range and choice of appropriate housing land opportunities in larger villages outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right, including Marshfield/ Castleton.

The proposals are also objected to on the basis of the above.

The reasons are expanded on in the accompanying submission document which includes a Sustainability Appraisal for the alternative site.

HOUSING POLICIES

4.5.1 Newport has been successful in recent years in securing development on sites along the River Usk, Old Town Dock, Mon Bank Sidings and other sustainable locations where existing and proposed forms of development are contributing positively to enhancing the image of the new City. Selective releases will be required, however, in order to maximise housing land opportunities. These will need to include relatively small sites where appropriate forms of development can be accommodated which reflect the existing settlement pattern of the surrounding villages and where development can be accommodated which would not represent a major intrusion into the surrounding countryside.

5.2 On the edge of the City and its 'satellite' settlements such as Marshfield/Castleton, in order to maintain a range and choice of appropriate housing land opportunities, there will be a continuing need to include relatively small sites where low density forms of development can be accommodated which reflect the existing settlement pattern of the area and where development would not represent an intrusion into the surrounding countryside.

5.3 Whilst Marshfield is a village outside the main urban area of Newport, there is no specific reference in the Plan to the larger settlements outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right.

5.4 In the above context, Marshfield, as part of the linked settlement with Castleton, merits such consideration. The Ward has a population of over 4,000, approximately 3,000 of 5.5 w'Chluicshte Iriv' es eintt Itehme etwntos vvilhlaicghe sc. ombined have a sustainable range of facilities are regarded as 'sustainable settlements' in various Local Development Plans in Wales and provision for appropriate growth is made. For this reason Policy H1 is objected to on the grounds that specific provision, either by specific site allocations or by favouring amendments to the settlement boundaries for a sustainable mix of housing should be identified in Marshfield/Castleton.

5.6 In the context of the above, supporting paragraph 5.9 refers to the likely contribution from small sites, whilst 5.10 refers to an allowance of 50 units a year which are estimated to come forward as part of a 'windfall allowance' for infill and windfall sites. With urban and settlement boundaries remaining as they were from the Unitary Development Plan, such figures are unlikely to be realised given the number of windfall sites already associated with large brownfield releases.

Additional Information Submitted - Available on Request

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3074.D3//SP05	Jones, Mr Stephen	Asbri Planning		24/05/2012	<input type="checkbox"/>	P	O		M	
Document: Deposit Plan, p.18		Site: 385/ Ty Mawr			Boundary Change					

Policy: SP05

Summary: Objection that the inclusion of the site within Countryside allocation

Item Question Representation Text

11 11 Site Name
Ty Mawr Lane Marshfield

14 14 Representation

The site is occupied by a single dwelling - Green field Cottages with associated land which can be considered to be within its curtilage. It is bounded by existing residential development on two sites and there is an industrial use on the opposite side of Ty Mawr Lane. (JT Meakin Ltd). As such the inclusion of the site beyond settlement boundaries shown is inappropriate given the site's characteristics and its degree of containment and firm boundary to the north, in the form of a distinctive belt of vegetation.

The inclusion of the site outside the proposed settlement boundary for Marshfield and within an area of countryside covered by Policy SP 5 - Countryside is objected to.

The reasons are expanded on in the accompanying submission document which includes a sustainability appraisal for the Alternative Site.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
To put the case forward for the site's inclusion and to present evidence directly before the Inspector.

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2 and CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3074.D4//SP08	Jones, Mr Stephen	Asbri Planning		24/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.20

Site: 386/ Ty Mawr

Boundary
Change

Policy: SP08

Summary: Objection to site being within Special Landscape Area designation

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number SP8	
4	4	The Proposals Map	Yes
5	5	Inset Plan(s) Marshfield	Yes
11	11	Site Name Ty Mawr Lane	
14	14	Representation Whilst Policy SP8 - Special Landscape Areas, does not necessarily preclude development from taking place, subject to the design being of high quality, the Policy is nevertheless objected to on the grounds that the contained nature of the sites separates it from the wider areas of open countryside to the east and south, where the SLA designation is more appropriate. In being applied to the distinctive character of the Wentlooge Levels. The reasons are expanded on in the accompanying Submission Document which includes a sustainability appraisal. For the alternative site.	
Additional Information Submitted - Available on Request			
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE2 and CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3074.D5//SP07	Jones, Mr Stephen	Asbri Planning		29/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.19

Site: 387/ Ty Mawr

Boundary Change

Policy: SP07

Summary: Objection to allocation of Green Wedge in this location

Item Question	Representation Text	Soundness Test
2 2	Policy Number SP7	
4 4	The Proposals Map	
11 11	Site Name Ty Mawr Lane, Marshfield	
14 14	Representation Planning Policy Wales (PPW) - Edition 4, Feb 2011, suggests that green wedge policies and boundaries should be reviewed as part of the Development Plan review process. At paragraph 4.7.12 PPW states that: "In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries. Green wedge policy should be reviewed as part of the development plan review process." PPW makes it clear that only land that is strictly necessary to fulfil the purpose should be included within a green wedge and that clearly identifiable features should be used to establish 'defensible boundaries'. It is clear that the inclusion of the site within a proposed green wedge is contrary to the above as its development would not prejudice the gap which exists between Newport and Marshfield and existing development already extends further to the north and east. On this basis Policy SP7 is objected to. The reasons are expanded on in the accompanying submission document which includes a Sustainability Appraisal of the alternative site.	
Additional Information Submitted - Available on Request		
15 15	Do you want to speak at Public Examination?	Yes
16 16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3075.D1//H15.02	Netherway, Cllr Rachael			24/05/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to allocation of Queensway Meadows as a transit site under Policy 15

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-
 1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided.

2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.

3) WAG guidelines state that sites should not be in a flood plain.

4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.

5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach infrastructure.

6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infrastructure.

These are my objections, please take them into consideration before making your decision.

- An email was also received on 24/05/2012 from this representor raising additional concerns about the proposed transit site at Queensway Meadow;

I spoke to Blackeye, chase's mother today, they are very concerned about one of the sites being a transit site. They already have incidents of the gates to their site being forced open by other travellers to gain access, and their families are being harrassed. They are concerned that friction due to family feuds will escalate if a stop over site is placed nearby. This proves a point once again, there are a number of vans illegally parked on the grass verge nearby. They have vandalised the wooden posts in order to gain access and the whole area is a disgrace. In a time when we need to be encouraging new business to the area, this kind of behaviour is sure to be counter productive.

Clearly Nash is not a suitable area to place 3 sites, as I have stated in my previous letter to yourselves, there is no infrastructure in place, we are on a flood plain and very very close to sites of SSI. I urge you to think long and hard about the impact these decisions will have on the residents of Nash.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3075.D2//H16.02	Netherway, Cllr Rachael			24/05/2012	<input type="checkbox"/>	P	C		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to allocation of Former Army Barracks under Polcy H16

Item Question Representation Text

14	14	Representation	Neither
<p>I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-</p> <ol style="list-style-type: none"> 1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided. 2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer. 3) WAG guidelines state that sites should not be in a flood plain. 4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children. 5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would likev to point out there is no street lighting on Broadstreet Common or pavements to reach infastructure. 6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infastructure. <p>These are my objections, please take them into consideration before making your decision.</p>			

15	15	Do you want to speak at Public Examination?	Neither
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Item Question Soundness Test

1	1	I think the LDP is sound.	Neither
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3075.D3//H16.03	Netherway, Cllr Rachael			24/05/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to Former Army Camp Site allocation under Policy H16

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-
 1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided.

2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.

3) WAG guidelines state that sites should not be in a flood plain.

4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.

5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would likev to point out there is no street lighting on Broadstreet Common or pavements to reach infastructure.

6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infastructure.

These are my objections, please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3075.D4//H17	Netherway, Cllr Rachael			24/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to the proposed travellers sites within Nash, Whitson and Goldcliff

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed travellers sites within the three parishes of Nash, Whitson and Goldcliff, Policies H15, H16 & H17. my reasons for objecting are as follows:-

1) one of the proposed sites is in the middle of an SSSI area, with one also on the edge of it. The Welsh Assembly Government (hereafter referred to a WAG) guidelines states sites of important biodiversity should be avoided.

2) No mains sewage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.

3) WAG guidelines state that sites should not be in a flood plain.

4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.

5) The travellers should also have easy and safe access to schools, GP's etc. Preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach infrastructure.

6) WAG guidelines state that the sites should respect the scale of, & no be so large as to dominate the nearest settled community & avoid pacing and undue burden on the local infrastructure.

These are my objections, please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3075.D5//H16	Netherway, Cllr Rachael			24/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Policy: H16

Summary: Outlining that Nash is not a suitable area to place three traveller/Gypsy sites

Item Question Representation Text

14 14 Representation

After a very interesting meeting at Nash Village hall yesterday evening at which many valid points were raised by local residents & business people- sadly none of which were answered to a satisfactory conclusion. I took the opportunity to speak to Chase one of the residents of the temp/permanent site on Queensway Meadows. He informed me, that 3 months on, they are still waiting for running water. As this is a private site, I'm guessing that falls outside your remit, however it does leave me wondering how an entire family can be moved without adequate provisions being in place before hand. This just highlights the point that the area is totally unsuitable for traveller/gypsy sites.

I spoke to Blackeye, Chase's mother today, they are very concerned about one of the sites being a transit site. They have already had incidents of the gates to their sites being forced open by other travellers to gain access, & their families being harassed. They are concerned that friction due to family feuds will escalate if a stop over site is placed nearby. This proves a point as once again, there are a number of vans illegally parked on the grass verge nearby. They have vandalised the wooden posts in order to gain access & the whole area is a disgrace. In a time when we need to encourage new business to the area, this kind of behaviour is sure to be counter productive.

Clearly, Nash is not a suitable area to place 3 sites. As I have stated in my previous letter to yourselves, there is no infrastructure in place, we are on a flood plain & very, very close to sites of SSI. I urge you to think long & hard about the impact these decisions will have on the residents of Nash.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3076.D1//H15.02	Storage Giant			14/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to Gypsy and Travellers site at Queensway Meadows.

Item	Question	Representation Text
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2	2	Policy Number H15
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11	11	Site Name Queensway Meadows
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14	14	Representation
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I would like to object to the citing of a gypsy/traveller site at Queensway Meadows within the Local Development Plan, on the basis that this does not represent sound judgement on the part of the council.

It is also my view that this proposal has failed P1, procedural test, because it does not appear to have been prepared with any involved by the local community. The first we have heard about this potential site was after the council has already earmarked the site at Queensway Meadows and travellers were already using it. Also, C1 and C4 consistency test, because I cannot see that the use of this land as a traveller site has any regard to other more relevant development and strategies in the Queensway Meadows area, or that it has taken account of community strategies. Finally, CE2 coherence and effectiveness test, has failed, because how can NCC say that this is realist and/or appropriate having other more suitable sites to consider, with reduced security concerns.

There has been a considerable investment in this area by local and national businesses, with further significant investment planned. However, this investment could be curtailed, and in fact further investment and job creation has already been halted by Celtic Recycling due to the proposed traveller site. We also had some additional investment planned for the area, and this has now been shelved in light of the proposed traveller site.

It should be of little surprise to the council that local businesses are very concerned and have taken up a petition to voice this concern. Over 100 business's have signed this petition and I would therefore strongly urge the council to listen to business tax payers who make a considerable contribution to rates receipts each year.

In order to make the development plan sound, this site should be located elsewhere on a more appropriate site, away from business and residential; premises.

I would also like to remind the council of the massive cleanup which had to take place at the LG factory after travellers took up occupancy there. The cost of this cleanup would no doubt have been funded from tax payers, and perhaps even more importantly, the image this portrayed to passerby, who could see hundreds of dirty nappies and other broken and discarded items strewn across the area they occupied. This is not an image that any growing and progressive city should be displaying or tolerating.

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	No
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Item	Question	Tick-box reply
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6	6	A new policy	Yes
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10	10	Delete an existing site.	No
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3077.D1//H16.02	Ducroq, Mr & Mrs A.C.			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to allocation of Gypsy and Traveller sites H16 (ii) and H16 (iii)

Item Question	Representation Text
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2 2	Policy Number H16
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11 11	Site Name Former Army Barracks, Pye Corner
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14 14	Representation
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I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy and Traveller sites within the rural village of Nash. The main reasons for objection against Policies H15, H16 and H17 in the Local Development Plan areas follows;

1. Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding.
2. the two sites on Broadstreet Common are in the middle of SSSI area or on the edge of one.
3. the two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.
4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).
5. Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate to the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of the sites alone could include around 40 caravans, and house more than 100 traveller. You already have sited a temporary' travellers site at Queensway Meadows with a considerable number of residents There are only just 200 electors shown on the Electoral Register for Nash Village, therefore the impact on our rural community will be considerable.
6. Residents of Nash have been refused planning permission for any new builds for many years because Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village, and that there is no mains sewerage in parts of the village.

I would like confirmation that my views have been registered as part of the LDP consultation.

15 15	Do you want to speak at Public Examination?	Neither
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Item Question	Soundness Test
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1 1	I think the LDP is sound.	Neither
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Item Question	Tick-box reply
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10 10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3077.D2//H16.03	Ducroq, Mr & Mrs A.C.			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to Former Army Camp being allocated as Gypsy and Traveller accommodation (H16(iii))

Item	Question	Representation Text	Response
2	2	Policy Number H16 iii	
4	4	The Proposals Map	Yes
12	12	Site Reference H16 iii	
14	14	Representation I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy and Traveller sites within the rural village of Nash. The main reasons for objection against Polices H15, H16 and H17 in the Local Development pLan areas follows; 1. Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding. 2. the two sites on Broadstreet Common are in the middle of SSSI area or on the edge of one. 3. the two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape. 4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites). 5. Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate to the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of the sites alone could include around 40 caravans, and house more than 100 traveller. You already have sited a temporary' travellers site at Queensway Meadows with a considerable number of residents There are only just 200 electors shown on the Electoral Register for Nash Village, therefore the impact on our rural community will be considerable. 6. Residents of Nash have been refused planning permission for any new builds for many years because Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village, and that there is no mains sewerage in parts of the village. I would like confirmation that my views have been registered as part of the LDP consultation.	
15	15	Do you want to speak at Public Examination?	Neither
<i>Item Question Soundness Test</i>			
1	1	I think the LDP is sound.	Neither
<i>Item Question Tick-box reply</i>			
10	10	Delete an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3077.D3//H15.02	Ducroq, Mr & Mrs A.C.			24/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Obejection to the allocation of Gypsy/Traveller site in Nash

Item Question Representation Text

14 14 Representation

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

1) Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding.

2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one.

3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.

4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).

5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. You already have sited a 'temporary' travellers site at Queensway Meadows with a considerable number of residents there are only just over 200 electors shown on the Electoral Register for Nash Village, therefore the impact on our rural community will be considerable.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3077.D4/H17	Ducroq, Mr & Mrs A.C.			24/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to the allocation of Gypsy and Traveller accommodation at Nash

Item Question Representation Text

14 14 Representation

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

1) Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding.

2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one.

3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.

4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).

5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. You already have sited a 'temporary' travellers site at Queensway Meadows with a considerable number of residents there are only just over 200 electors shown on the Electoral Register for Nash Village, therefore the impact on our rural community will be considerable.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3078.D1//H15.02	Wood, Mr & Mrs Jason			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to inclusion of Queensway Meadow Site in Deposit Plan for Gypsy and Traveller use

Item Question Representation Text

2 2 Policy Number
H15 ii

4 4 The Proposals Map

11 11 Site Name
Queensway Meadow H15 ii

14 14 Representation

I wish to formally object to proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to a WAG) guidelines state sites of important biodiversity should be avoided.
 - 2) No mains sewerage facilities exist in Broadstreet Common. Therefore ratepayer would end up "footing the bill".
 - 3) WAG guidelines state that sites should not be on a flood plain.
 - 4) Chosen areas should have a safe play are for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
 - 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.
- These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Item Question

Tick-box reply

10 10 Delete an existing site.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3078.D2//H16.02	Wood, Mr & Mrs Jason			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to the inclusion of Former Army Barracks in Deposit Plan for Gypsy and Traveller accommodation

Item Question Representation Text

2 2 Policy Number
H16 ii

4 4 The Proposals Map

Yes

11 11 Site Name
Former Army barracks H16 ii

14 14 Representation

I wish to formally object to proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to a WAG) guidelines state sites of important biodiversity should be avoided.
 - 2) No mains sewerage facilities exist in Broadstreet Common. Therefore ratepayer would end up "footing the bill".
 - 3) WAG guidelines state that sites should not be on a flood plain.
 - 4) Chosen areas should have a safe play are for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
 - 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.
- These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3078.D3//H16.03	Wood, Mr & Mrs Jason			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to Former Army Camp inclusion in Deposit Plan for Gypsy and Traveller accommodation

Item Question Representation Text

2 2 Policy Number
H16 iii

4 4 The Proposals Map

Yes

11 11 Site Name
Former Army Camp H16 iii

14 14 Representation

I wish to formally object to proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to a WAG) guidelines state sites of important biodiversity should be avoided.
 - 2) No mains sewerage facilities exist in Broadstreet Common. Therefore ratepayer would end up "footing the bill".
 - 3) WAG guidelines state that sites should not be on a flood plain.
 - 4) Chosen areas should have a safe play are for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
 - 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.
- These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3078.D4//H16	Wood, Mr & Mrs Jason			24/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H16

Summary: Objection to the allocation of Gypsy and Traveller accommodation at Nash

Item Question Representation Text

14 14 Representation

I wish to formally raise objectives to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to a WAG) guidelines state sites of important biodiversity should be avoided.
- 2) No mains sewerage facilities exist in Broadstreet Common. Therefore ratepayer would end up "footing the bill".
- 3) WAG guidelines state that sites should not be on a flood plain.
- 4) Chosen areas should have a safe play are for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
- 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
- 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.

These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3079.D1//H16.02	Price, Mr & Mrs C.D.J.			29/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to inclusion of site for Gypsy and Traveller accommodation

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number H16 ii		
11	11	Site Name Former army Barracks H16 iii		
14	14	Representation Please accept this letter as a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash. The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows; 1) Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding. 2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one. 3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape. 4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites). 5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village. 6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.		
15	15	Do you want to speak at Public Examination?	Neither	
1	1	I think the LDP is sound.	Neither	
10	10	Delete an existing site.	Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3079.D2//H16.03	Price, Mr & Mrs C.D.J.			29/06/2012	<input type="checkbox"/>	W	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to inclusion of site in Deposit Plan for Gypsy and Traveller accommodation

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number H16iii		
4	4	The Proposals Map		
11	11	Site Name Former Army camp		
14	14	Representation Please accept this letter as a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash. The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows; 1) Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding. 2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one. 3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape. 4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites). 5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village. 6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.		
15	15	Do you want to speak at Public Examination?	Neither	
1	1	I think the LDP is sound.	Neither	
10	10	Delete an existing site.	Yes	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3079.D3//H15.02	Price, Mr & Mrs C.D.J.			24/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to the proposed Gypsy and Traveller sites within the area of Nash

Item Question Representation Text

14 14 Representation

Please accept this letter as a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

1) Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding.

2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one.

3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.

4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).

5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3079.D4//H17	Price, Mr & Mrs C.D.J.			23/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to policy H17 for Gypsy and Traveller accommodation proposals

Item Question Representation Text

14 14 Representation

Please accept this letter as a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

1) Welsh Government guidelines clearly state that such sites should not be in a flood plain, especially given the vulnerabilities of caravans to flooding.

2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one.

3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.

4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).

5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3080.D1//H15.02	Jones, Mr & Mrs Peter and Deborah			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Delivery Agreement, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to inclusion of site for Gypsy and Traveller accommodation

Item	Question	Representation Text	Response
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2	2	Policy Number H15 ii	
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4	4	The Proposals Map	Yes
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11	11	Site Name Queensway Meadow	
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14	14	Representation	
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As residents of Nash my husband and I would like to raise our objections to the three proposed sites at Broadstreet Common and Queensway Meadows. We are aware that the Welsh Government and Newport City Council have already given permission for an "official" temporary site at Queensway Meadows. There was no planning application or consultation with either residents or companies operating along Queensway Meadows. Our concerns are that Newport City Council may again grant "official" temporary planning at the other three sites.

The main reasons we are objecting against Policies H15, H16 and H17 in the Local Development Plan are:

- 1) Welsh Government guidelines state that sites should not be established in a plod plain.
- 2) The two sites on Broadstreet Common are either in the middle of a SSSI or situated on the edge of a SSSI.
- 3) The sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.
- 4) The Gwent Levels are intersected by a great number of reens, whilst a great attraction for children, they pose a very significant risk of drowning.
- 5) Welsh Government guidelines state that any traveller site should not be so large that it dominates the nearest settled community, and should not place undue burden on the local infrastructure. There are no schools within walking distance of the sites, bus services are poor, Doctors, Dentists, chemist and shopping facilities are all a car ride away. The access roads to the recommended sites are very poorly maintained and increased traffic would only worsen them.
- 6) The residents of Nash, Whitson and Goldcliff have for many years and for various reasons been refused new build planning permission. Newport City Council's policy of not allowing development within a flood plain or outside the environs of the village and there is not mains sewerage to most of the villages.

Would we be correct in thinking that if the Council changes its planning policy to allow these Traveller Sites, then as residents we ought to be able to get new build planning permission for our children to live closer to us?

There were 200 sites originally identified as possible traveller sites, some of these are owned by Newport Council, some were far more suitable and also met the Welsh Government guidelines for traveller sites. We think some of these options ought to be looked at again.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	Neither
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Item Question

Tick-box reply

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
10 10	Delete an existing site.		Yes							

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3080.D2//H16.02	Jones, Mr & Mrs Peter and Deborah			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to inclusion of site for Gypsy and Traveller purposes

Item	Question	Representation Text	Soundness Test
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2	2	Policy Number H16 ii	
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4	4	The Proposals Map	Yes
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11	11	Site Name Former Army Barracks H16 ii	
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14	14	Representation	
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As residents of Nash my husband and I would like to raise our objections to the three proposed sites at Broadstreet Common and Queensway Meadows. We are aware that the Welsh Government and Newport City Council have already given permission for an "official" temporary site at Queensway Meadows. There was no planning application or consultation with either residents or companies operating along Queensway Meadows. Our concerns are that Newport City Council may again grant "official" temporary planning at the other three sites.

The main reasons we are objecting against Policies H15, H16 and H17 in the Local Development Plan are:

- 1) Welsh Government guidelines state that sites should not be established in a plod plain.
- 2) The two sites on Broadstreet Common are either in the middle of a SSSI or situated on the edge of a SSSI.
- 3) The sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.
- 4) The Gwent Levels are intersected by a great number of reens, whilst a great attraction for children, they pose a very significant risk of drowning.
- 5) Welsh Government guidelines state that any traveller site should not be so large that it dominates the nearest settled community, and should not place undue burden on the local infrastructure. There are no schools within walking distance of the sites, bus services are poor, Doctors, Dentists, chemist and shopping facilities are all a car ride away. The access roads to the recommended sites are very poorly maintained and increased traffic would only worsen them.
- 6) The residents of Nash, Whitson and Goldcliff have for many years and for various reasons been refused new build planning permission. Newport City Council's policy of not allowing development within a flood plain or outside the environs of the village and there is not mains sewerage to most of the villages.

Would we be correct in thinking that if the Council changes its planning policy to allow these Traveller Sites, then as residents we ought to be able to get new build planning permission for our children to live closer to us?

There were 200 sites originally identified as possible traveller sites, some of these are owned by Newport Council, some were far more suitable and also met the Welsh Government guidelines for traveller sites. We think some of these options ought to be looked at again.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test	Tick-box reply
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1	1	I think the LDP is sound.	Neither
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Item Question

Tick-box reply

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
10 10	Delete an existing site.		Yes							

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3080.D3//H16.03	Jones, Mr & Mrs Peter and Deborah			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to inclusion of site in Deposit Plan for Gypsy and Traveller purposes

Item	Question	Representation Text
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2	2	Policy Number H16 iii
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4	4	The Proposals Map
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Yes

11	11	Site Name Former Army Camp
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14	14	Representation
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As residents of Nash my husband and I would like to raise our objections to the three proposed sites at Broadstreet Common and Queensway Meadows. We are aware that the Welsh Government and Newport City Council have already given permission for an "official" temporary site at Queensway Meadows. There was no planning application or consultation with either residents or companies operating along Queensway Meadows. Our concerns are that Newport City Council may again grant "official" temporary planning at the other three sites.

The main reasons we are objecting against Policies H15, H16 and H17 in the Local Development Plan are:

- 1) Welsh Government guidelines state that sites should not be established in a plod plain.
- 2) The two sites on Broadstreet Common are either in the middle of a SSSI or situated on the edge of a SSSI.
- 3) The sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.
- 4) The Gwent Levels are intersected by a great number of reens, whilst a great attraction for children, they pose a very significant risk of drowning.
- 5) Welsh Government guidelines state that any traveller site should not be so large that it dominates the nearest settled community, and should not place undue burden on the local infrastructure. There are no schools within walking distance of the sites, bus services are poor, Doctors, Dentists, chemist and shopping facilities are all a car ride away. The access roads to the recommended sites are very poorly maintained and increased traffic would only worsen them.
- 6) The residents of Nash, Whitson and Goldcliff have for many years and for various reasons been refused new build planning permission. Newport City Council's policy of not allowing development within a flood plain or outside the environs of the village and there is not mains sewerage to most of the villages.

Would we be correct in thinking that if the Council changes its planning policy to allow these Traveller Sites, then as residents we ought to be able to get new build planning permission for our children to live closer to us?

There were 200 sites originally identified as possible traveller sites, some of these are owned by Newport Council, some were far more suitable and also met the Welsh Government guidelines for traveller sites. We think some of these options ought to be looked at again.

15	15	Do you want to speak at Public Examination?
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Neither

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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Neither

Item Question

Tick-box reply

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
10 10	Delete an existing site.		Yes							

3080.D4//H17	Jones, Mr & Mrs Peter and Deborah			08/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to policy H17 for Gypsy and Traveller accommodation proposals

Item Question Representation Text

14 14 Representation

As residents of Nash my husband and I would like to raise our objections to the three proposed sites at Broadstreet Common and Queensway Meadows. We are aware that the Welsh Government and Newport City Council have already given permission for an "official" temporary site at Queensway Meadows. There was no planning application or consultation with either residents or companies operating along Queensway Meadows. Our concerns are that Newport City Council may again grant "official" temporary planning at the other three sites.

The main reasons we are objecting against Policies H15, H16 and H17 in the Local Development Plan are:

- 1) Welsh Government guidelines state that sites should not be established in a plod plain.
- 2) The two sites on Broadstreet Common are either in the middle of a SSSI or situated on the edge of a SSSI.
- 3) The sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.
- 4) The Gwent Levels are intersected by a great number of reens, whilst a great attraction for children, they pose a very significant risk of drowning.
- 5) Welsh Government guidelines state that any traveller site should not be so large that it dominates the nearest settled community, and should not place undue burden on the local infrastructure. There are no schools within walking distance of the sites, bus services are poor, Doctors, Dentists, chemist and shopping facilities are all a car ride away. The access roads to the recommended sites are very poorly maintained and increased traffic would only worsen them.
- 6) The residents of Nash, Whitson and Goldcliff have for many years and for various reasons been refused new build planning permission. Newport City Council's policy of not allowing development within a flood plain or outside the environs of the village and there is not mains sewerage to most of the villages.

Would we be correct in thinking that if the Council changes its planning policy to allow these Traveller Sites, then as residents we ought to be able to get new build planning permission for our children to live closer to us?

There were 200 sites originally identified as possible traveller sites, some of these are owned by Newport Council, some were far more suitable and also met the Welsh Government guidelines for traveller sites. We think some of these options ought to be looked at again.

15 15	Do you want to speak at Public Examination?	Neither
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Item Question Soundness Test

1 1	I think the LDP is sound.	Neither
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3081.D1//H15.02	Green, Mr P.M.			29/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to inclusion of site in the Deposit Plan for Gypsy and Traveller accommodation

Item Question Representation Text

2 2 Policy Number
H15 ii

4 4 The Proposals Map

Yes

14 14 Representation

I would like to add my objections to the proposed siteing of 3 gypsy / traveller sites in the local community of Nash.

- 1) The Welsh Government guidelines say they should not be sited in a flood plain.
- 2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the very edge of one.
- 3) On the proposed planning application there could be 40+ caravans on these sites which would at least double the number of residents in the area of Nash. The Welsh Government guidelines state the sites should not dominate the nearest settled community or place a burden on the local infrastructure.
- 4) In the past residents of Nash have been refused planning permission for any new builds because of Newport City Councils policy of not allowing development on flood plains or outside the environs of the village and the fact that there is no main sewerage in many parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3081.D2//H16.02	Green, Mr P.M.			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to inclusion of site in Deposit Plan for Gypsy and Traveller purposes

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Tick-box reply</i>
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2	2	Policy Number H16 ii	
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4	4	The Proposals Map	Yes
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11	11	Site Name Former Army Barracks	
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14	14	Representation	
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I would like to add my objections to the proposed siteing of 3 gypsy / traveller sites in the local community of Nash.

1) The Welsh Government guidelines say they should not be sited in a flood plain.

2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the very edge of one.

3) On the proposed planning application there could be 40+ caravans on these sites which would at least double the number of residents in the area of Nash. The Welsh Government guidelines state the sites should not dominate the nearest settled community or place a burden on the local infrastructure.

4) In the past residents of Nash have been refused planning permission for any new builds because of Newport City Councils policy of not allowing development on flood plains or outside the environs of the village and the fact that there is no main sewerage in many parts of the village.

15	15	Do you want to speak at Public Examination?	Neither
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<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Tick-box reply</i>
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10	10	Delete an existing site.	Yes
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3081.D3//H16.03	Green, Mr P.M.			29/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to the inclusion of the site in the deposit plan for Gypsy and Traveller accommodation

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Tick-box reply</i>
2 2	Policy Number	h16 iii	
4 4	The Proposals Map		Yes
11 11	Site Name	former army camp	
14 14	Representation	I would like to add my objections to the proposed siteing of 3 gypsy / traveller sites in the local community of Nash. 1) The Welsh Government guidelines say they should not be sited in a flood plain. 2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the very edge of one. 3) On the proposed planning application there could be 40+ caravans on these sites which would at least double the number of residents in the area of Nash. The Welsh Government guidelines state the sites should not dominate the nearest settled community or place a burden on the local infrastructure. 4) In the past residents of Nash have been refused planning permission for any new builds because of Newport City Councils policy of not allowing development on flood plains or outside the environs of the village and the fact that there is no main sewerage in many parts of the village.	
15 15	Do you want to speak at Public Examination?		Neither
10 10	Delete an existing site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3081.D4//H17	Green, Mr P.M.			10/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to policy H17 for Gypsy and Traveller accommodation proposals

Item Question Representation Text

14 14 Representation

I would like to add my objections to the proposed siteing of 3 gypsy / traveller sites in the local community of Nash.

- 1) The Welsh Government guidelines say they should not be sited in a flood plain.
- 2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the very edge of one.
- 3) On the proposed planning application there could be 40+ caravans on these sites which would at least double the number of residents in the area of Nash. The Welsh Government guidelines state the sites should not dominate the nearest settled community or place a burden on the local infrastructure.
- 4) In the past residents of Nash have been refused planning permission for any new builds because of Newport City Councils policy of not allowing development on flood plains or outside the environs of the village and the fact that there is no main sewerage in many parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3082.D11/W1	Deborah, Ms Price			29/06/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.113

Site: 424/ South of Llanwern Steelworks

Delete Site

Policy: W1

Summary: Objection to allocation of Tatton Road site for Waste MBT purposes

Item	Question	Representation Text
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2	2	Policy Number
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W1

4	4	The Proposals Map
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Yes

11	11	Site Name
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Land south of Llanwern Steelworks (Tatton Road)

12	12	Site Reference
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W1

14	14	Representation
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I would like to register my objection to the waste provisions in the Newport Local Development Plan (LDP) based on the following concerns:

1) The steelworks site in Llanwern is allocated both for extensive residential development and a regional waste disposal facility serving 5 countries, which would be a mass-burn incinerator and ash processing facility under Prosiect Gwyrdd. The two designations are incompatible. All references to a regional waste disposal facility at Llanwern should be removed from the LDP for the following reasons:

The proximity to planned/existing schools, and infant nurseries, a new housing estate, as well as the densely populated village of Underwood, is unacceptable in terms of the health impacts from incineration.

The site abuts a protected Site of Special Scientific Interest and is very close to 3 others. Together with the estuary they form the most valuable wildlife ecosystem in this part of Wales. Contamination of this delicate this internationally and nationally designated area.

The Gwent Levels is designated for its historical landscape importance. An incinerator with a 50/60 meter-high chimney will have a large negative visual impact on the landscape and is unacceptable. Toxins released onto farmland and absorbed into cattle and the food chain represents an unacceptable impact to health.

The area has a history of flooding which will increase the risk and affects of toxins through run-off and drainage entering the sensitive local reen system of the Levels the national advice from WG for areas with this category of flood risk is that they would be unsuitable for any major waste facility.

2) the LDP should not support the construction of a mass-burn incinerator. While there is a need for waste treatment facilities in South East Wales, there is not proven need for an incinerator. There are much more cost-effective, adaptable, less polluting and less climate- changing ways to treat our waste, by increased recycling and systems such as Mechanical and Biological Treatment.

In conclusion I request that Section 11 and other parts of the LDP (including the Waste Background Paper) are amended to:

1) Delete all references to a regional waste disposal or processing facility at Llanwern.

2) Remove all text implying that the Plan will endorse a mass-burn incinerator in Newport or its vicinity.

3) Delete all text approving a waste strategy based on Prosiect Gwyrdd's shortlist of two incinerators.

4) Add text in the LDP stating that it will follow Newport's existing Waste Strategy Plan which calls for mechanical and biological treatment (MBT) facilities to be used to treat the area's residual waste.

15	15	Do you want to speak at Public Examination?
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Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.								Neither	
<i>Item Question</i>									<i>Tick-box reply</i>	
10 10	Delete an existing site.								Yes	

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3083.D1//H16.02	Knorz, Mr & Mrs C			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to site inclusion in the plan for Gypsy and Traveller accommodation

Item	Question	Representation Text	Response
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2	2	Policy Number H16 ii	
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4	4	The Proposals Map	Yes
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11	11	Site Name Former Army Barracks	
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12	12	Site Reference H16 ii	
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14	14	Representation	
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We are objecting to the Policies H15, H16 and H17 in the Local Development Plan.

Welsh Government guidelines say they should not be in a flood plain.

The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.

The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.

The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).

Welsh government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure.

Many residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	Neither
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Item	Question	Response
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10	10	Delete an existing site.	Yes
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3083.D2//H16.03	Knorz, Mr & Mrs C			29/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to inclusion of site in Deposit plan for Gypsy and Traveller accommodation

Item	Question	Representation Text	Response
2 2	Policy Number	h16 iii	
4 4	The Proposals Map		Yes
11 11	Site Name	Former Army Camp H16 iii	
14 14	Representation		

We are objecting to the Policies H15, H16 and H17 in the Local Development Plan.

Welsh Government guidelines say they should not be in a flood plain.

The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.

The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.

The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).

Welsh government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing and undue burden on the local infrastructure.

Many residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there no main sewers in parts of the village.

15 15	Do you want to speak at Public Examination?		Neither
1 1	I think the LDP is sound.		Neither
10 10	Delete an existing site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3083.D3//H15	Knorz, Mr & Mrs C			09/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.71

Policy: H15

Summary: Objection to Policy H15 Gypsy and Traveller accommodation proposals

Item Question *Representation Text*

14 14 Representation

We are objecting to the Policies H15, H16 and H17 in the Local Development Plan.

Welsh Government guidelines say they should not be in a flood plain.

The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.

The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.

The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).

Welsh government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing and undue burden on the local infrastructure.

Many residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3083.D4//H17	Knorz, Mr & Mrs C			09/05/2012	<input type="checkbox"/>	P	O		M	

Document:Deposit Plan, p.72

Policy: H17

Summary: Objection to Policy H17 for Gypsy and Traveller accommodaiton proposals

Item Question Representation Text

14 14 Representation

We are objecting to the Policies H15, H16 and H17 in the Local Development Plan.

Welsh Government guidelines say they should not be in a flood plain.

The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.

The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.

The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).

Welsh government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing and undue burden on the local infrastructure.

Many residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3084.D1//W1	Walters, Mr Rod			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.113

Site: 424/ South of Llanwern Steelworks

Delete Site

Policy: W1

Summary: Objection to inclusion of site in deposit plan for Waste mgt

Item	Question	Representation Text	Soundness Test
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2	2	Policy Number w1	
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4	4	The Proposals Map	Yes
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11	11	Site Name south of Llanwern Steel works (tatton road)	
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14	14	Representation	
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I would like to register my objection to the waste provisions in the Newport Local Development Plan (LDP) based on the following concerns:

1) The steelworks site in Llanwern is allocated both for extensive residential development and a regional waste disposal facility serving 5 countries, which would be a mass-burn incinerator and ash processing facility under Prosiect Gwyrdd. The two designations are incompatible. All references to a regional waste disposal facility at Llanwern should be removed from the LDP for the following reasons:

The proximity to planned/existing schools, and infant nurseries, a new housing estate, as well as the densely populated village of Underwood, is unacceptable in terms of health impacts from incineration. The Gwent Levels is designated for its historical landscape importance. An incinerator with a 50/60 meter-high chimney will have a large negative visual impact on the landscape and is unacceptable. Toxins released onto farmland and absorbed into cattle and the food chain represents an unacceptable impact to health.

The area has a history of flooding which will increase the risk and affects of toxins through run-off and drainage entering the sensitive local rean system of the Levels the national advice from WG for areas with this category of flood risk is that they would be unsuitable for any major waste facility.

2) The LDP should not support the construction of a mass-burn incinerator. While there is a need for waste treatment facilities in South East Wales, there is not proven need for an incinerator. There are much more cost-effective, adaptable, less polluting and less climate- changing ways to treat our waste, by increased recycling and systems such as Mechanical and Biological Treatment.

In conclusion I request that Section 11 and other parts of the LDP (including the Waste Background Paper) are amended to:

- 1) Delete all references to a regional waste disposal or processing facility at Llanwern.
- 2) Remove all text implying that the Plan will endorse a mass-burn incinerator in Newport or its vicinity.
- 3) Delete all text approving a waste strategy based on Prosiect Gwyrdd's shortlist of two incinerators.
- 4) Add text in the LDP stating that it will follow Newport's existing Waste Strategy Plan which calls for mechanical and biological treatment (MBT) facilities to be used to treat the area's residual waste.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test	Tick-box reply
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1	1	I think the LDP is sound.	Neither
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3085.D1//CE07	British Sign and Graphics Association	Chris Thomas Ltd		19/04/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.51

Policy: CE07

Summary: Objection to wording of policy as it is impractical, unnecessary and unsound

Item Question Representation Text

2 2 Policy Number
CE7

14 14 Representation

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in respect of Policy CE7 and supporting text in the Deposit Draft of the LDP.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans to ensure the emerging plan policies do not inappropriately apply more onerous considerations on advertisements than already apply with TAN7, 'Planning Policy Wales', Welsh Office Circular 14/92 and the Town and Country Planning (Control of Advertisements) Regulations 1992 and the Amendment Regulations 1994.

Policy CE7

The first sentence of the policy correctly identifies that all advertisements should be carefully designed and sited so as to relate to the building and surroundings. The second sentence advises that shops signs, including projecting signs, should be located "at fascia levels". The BSGA object to this second sentence as impractical, unnecessary and unsound.

Firstly, the policy takes no account on the many shops which do not have a form of "shopfront". Shops may be contained in all sorts of building, including those with no shopfront or feature which can be identified as a fascia. These may include former houses, offices or industrial buildings as well as warehouse-style large shops on commercial shopping parks and department stores within the city centre. All of these different types of building or surroundings. Additionally, this policy takes no account of the many thousands of advertisements which are wholly acceptably displayed within shop windows or on blank areas of wall, yet are not "fascia levels".

The second sentence of policy CE7 is also unnecessary. Provided any advertisement is acceptable on grounds of amenity (and public safety), it must be permitted. The factors in determining any advertisement's acceptability are set out in the first sentence of the policy. The second sentence is therefore wholly unnecessary.

Consequently, we maintain that the second sentence of policy CE7 is unsound and should be deleted.

15 15	Do you want to speak at Public Examination?	Neither
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Item Question Soundness Test

1 1	I think the LDP is sound.	No
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3088.D1//H15.02	Smith, Mr & Mrs D			18/05/2012	<input type="checkbox"/>	E	O		M	

Council Officer: LT

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to inclusion of site in Deposit Plan for Gypsy and Traveller accommodation

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2 2	Policy Number	h15 ii		
4 4	The Proposals Map		Yes	
11 11	Site Name	Queensway Meadow		
12 12	Site Reference	H15 ii		
14 14	Representation	We wish to lodge an objection to the proposed Travellers site in and around the are of Nash village under the LDP plans. The main reasons for objections against Policies H15, H16 and H17. These sites are proposed within SSSI areas or very near it. As we are aware government guidelines say these sites are not to be in a flood plain where a number of our friends and neighbours have been refused planning permission. There are also a number of inadequate infrastructure issues such as street lighting, footways, sewerage and drainage. We also believe that area is a potential hazard for young children such as deep and unprotected reens.		
15 15	Do you want to speak at Public Examination?		Neither	
1 1	I think the LDP is sound.		Neither	
10 10	Delete an existing site.		Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3088.D2//H16.02	Smith, Mr & Mrs D			18/05/2012	<input type="checkbox"/>	E	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to inclusion of site in deposit plan for Gypsy and Traveller accommodation

Item	Question	Representation Text	Response
2	2	Policy Number h16 ii	
4	4	The Proposals Map	Yes
11	11	Site Name former army barracks	
12	12	Site Reference h16 ii	
15	15	Do you want to speak at Public Examination?	Neither
<i>Item Question Soundness Test</i>			
1	1	I think the LDP is sound.	Neither
13	13	Test of Soundness We wish to lodge an objection to the proposed Travellers site in and around the are of Nash village under the LDP plans. The main reasons for objections against Policies H15, H16 and H17. These sites are proposed within SSSI areas or very near it. As we are aware government guidelines say these sites are not to be in a flood plain where a number of our friends and neighbours have been refused planning permission. There are also a number of inadequate infrastructure issues such as street lighting, footways, sewerage and drainage. We also believe that area is a potential hazard for young children such as deep and unprotected reens.	
<i>Item Question Tick-box reply</i>			
10	10	Delete an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3088.D3//H16.03	Smith, Mr & Mrs D			29/06/2012	<input type="checkbox"/>	E	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to inclusion of site in deposit plan for Gypsy and Traveller accommodation

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2 2	Policy Number	h16 iii		
4 4	The Proposals Map		Yes	
11 11	Site Name	former army camp		
12 12	Site Reference	h16 iii		
14 14	Representation	We wish to lodge an objection to the proposed Travellers site in and around the are of Nash village under the LDP plans. The main reasons for objections against Policies H15, H16 and H17. These sites are proposed within SSSI areas or very near it. As we are aware government guidelines say these sites are not to be in a flood plain where a number of our friends and neighbours have been refused planning permission. There are also a number of inadequate infrastructure issues such as street lighting, footways, sewerage and drainage. We also believe that area is a potential hazard for young children such as deep and unprotected reens.		
15 15	Do you want to speak at Public Examination?		Neither	
1 1	I think the LDP is sound.		Neither	
10 10	Delete an existing site.		Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3088.D4//H17	Smith, Mr & Mrs D			18/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to policy H17 Gypsy and Traveller accommodation proposals

Item Question *Representation Text*

14 14 Representation

We wish to lodge an objection to the proposed Travellers site in and around the are of Nash village under the LDP plans. The main reasons for objections against Policies H15, H16 and H17. These sites are proposed within SSSI areas or very near it. As we are aware government guidelines say these sites are not to be in a flood plain where a number of our friends and neighbours have been refused planning permission. There are also a number of inadequate infrastructure issues such as street lighting, footways, sewerage and drainage. We also believe that area is a potential hazard for young children such as deep and unprotected reens.

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3089.D1//H15.02	Hoskings, Mr & Mrs D.W.			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to inclusion of site in deposit plan for Gypsy and Traveller purposes

Item	Question	Representation Text	Response
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2	2	Policy Number H 15 ii	
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4	4	The Proposals Map	Yes
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11	11	Site Name Queensway Meadow	
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12	12	Site Reference H15 ii	
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14	14	Representation	
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We are writing to you to apose the 3 gypsy traveller sites on Broad Street Common and one on Queensway Meadow.

Main reasons for our objection against policies H15 – H16 and H17

The Welsh Government guideline say they should not be in a flood plain.

The two sites on Broad Street Common re in the middle of SSSI or on the edge of one.

The two sites on broad street common are within the rural area and outside the environs of the village, such a development would have a adverse impact on the rural landscape.

The sites on Broad Street Common are adjacent to deep reens which pose a drowning danger to the Gypsy Children.

We already have one Gypsy Caravan site on Broadstreet Common and a caravan park.

Another thing is our homes will go down in price if we have more Gypsy sites on Broadstreet common. Will our Council tax go down as well?

Another reason is the danger for the children of the Gypsy sites, there is a speed limit of 40 -50 mph along the road which is ignored by most drivers.

As you can see Broadstreet Common is not the place to have two Gypsy Sites.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	Neither
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Item	Question	Response
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3089.D2//H16.02	Hoskings, Mr & Mrs D.W.			29/06/2012	<input type="checkbox"/>	P			M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to inclusion of site in Deposit plan for Gypsy and Traveller purposes

Item	Question	Representation Text	Response
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2	2	Policy Number H16 ii	
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4	4	The Proposals Map	Yes
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11	11	Site Name Former Armer Barracks	
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12	12	Site Reference H16 ii	
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14	14	Representation	
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We are writing to you to apose the 3 gypsy traveller sites on Broad Street Common and one on Queensway Meadow.

Main reasons for our objection against policies H15 – H16 and H17

The Welsh Government guideline say they should not be in a flood plain.

The two sites on Broad Street Common re in the middle of SSSI or on the edge of one.

The two sites on broad street common are within the rural area and outside the environs of the village, such a development would have a adverse impact on the rural landscape.

The sites on Broad Street Common are adjacent to deep reens which pose a drowning danger to the Gypsy Children.

We already have one Gypsy Caravan site on Broadstreet Common and a caravan park.

Another thing is our homes will go down in price if we have more Gypsy sites on Broadstreet common. Will our Council tax go down as well?

Another reason is the danger for the children of the Gypsy sites, there is a speed limit of 40 -50 mph along the road which is ignored by most drivers.

As you can see Broadstreet Common is not the place to have two Gypsy Sites.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	Neither
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Item	Question	Response
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3089.D3//H16.03	Hoskings, Mr & Mrs D.W.			29/06/2012	<input type="checkbox"/>	P	O		M	
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Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to inclusion of site in deposit plan for Gypsy and Traveller purposes

Item	Question	Representation Text	Response
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2	2	Policy Number h 16 iii	
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4	4	The Proposals Map	Yes
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11	11	Site Name former army camp site	
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12	12	Site Reference h 16 iii	
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14	14	Representation	
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We are writing to you to apose the 3 gypsy traveller sites on Broad Street Common and one on Queensway Meadow.

Main reasons for our objection against policies H15 – H16 and H17

The Welsh Government guideline say they should not be in a flood plain.

The two sites on Broad Street Common re in the middle of SSSI or on the edge of one.

The two sites on broad street common are within the rural area and outside the environs of the village, such a development would have a adverse impact on the rural landscape.

The sites on Broad Street Common are adjacent to deep reens which pose a drowning danger to the Gypsy Children.

We already have one Gypsy Caravan site on Broadstreet Common and a caravan park.

Another thing is our homes will go down in price if we have more Gypsy sites on Broadstreet common. Will our Council tax go down as well?

Another reason is the danger for the children of the Gypsy sites, there is a speed limit of 40 -50 mph along the road which is ignored by most drivers.

As you can see Broadstreet Common is not the place to have two Gypsy Sites.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	Neither
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Item	Question	Response
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3089.D4//H17	Hoskings, Mr & Mrs D.W.			15/05/2012	<input type="checkbox"/>	P	O		M	

Document:Deposit Plan, p.72

Policy: H17

Summary: Objection to policy for Gypsy and Traveller accomodation proposals

Item Question Representation Text

14 14 Representation

We are writing to you to apose the 3 gypsy traveller sites on Broad Street Common and one on Queensway Meadow.
 Main reasons for our objection against policies H15 – H16 and H17
 The Welsh Government guideline say they should not be in a flood plain.
 The two sites on Broad Street Common re in the middle of SSSI or on the edge of one.
 The two sites on broad street common are within the rural area and outside the environs of the village, such a development would have a adverse impact on the rural landscape.
 The sites on Broad Street Common are adjacent to deep reens which pose a drowning danger to the Gypsy Children.
 We already have one Gypsy Caravan site on Broadstreet Common and a caravan park.
 Another thing is our homes will go down in price if we have more Gypsy sites on Broadstreet common. Will our Council tax go down as well?
 Another reason is the danger for the children of the Gypsy sites, there is a speed limit of 40 -50 mph along the road which is ignored by most drivers.
 As you can see Broadstreet Common is not the place to have two Gypsy Sites.

15 15 Do you want to speak at Public Examination? Neither

Item Question Soundness Test

1 1 I think the LDP is sound. Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3090.D1//H01	Herbert, Mr BC	Asbri Planning		24/05/2012	<input type="checkbox"/>	E	O		M	
		Additional material submitted		SA/SEA submitted						

Document: Deposit Plan, p.62

Site: 334/ Cwrt Camlas

New Site

Policy: H01

Map: Proposals Plan - West

Summary: Wants site at Bethesda Close included as site in the LDP

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H1	
4	4	The Proposals Map	Yes
11	11	Site Name Land at Bethesda Close, Rogerstone	
12	12	Site Reference 53.C1	
14	14	Representation Supporting paragraph 5.10 refers to such an estimate of 50 units a year (750 in total over the Plan period) which may come forward as part of a 'windfall allowance' for infill and windfall sites. With urban and settlement boundaries remaining as they were from the Unitary Development Plan, such figures are unlikely to be realised given the number of windfall sites already associated with large brownfield releases. More provision should therefore be made for specific housing land allocations on sites such as that being promoted at Bethesda Close, where evidence through planning application and appeal procedures has demonstrated that the Environmental Space designation is not necessary. Policy H1 is therefore objected to on the above basis and on the grounds that the submission site is not included as a housing land allocation under the policy. The Proposals Map is also objected to on the above basis. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site. Additional Information Submitted - Available on Request	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3090.D2//CE05	Herbert, Mr BC	Asbri Planning		24/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.49

Site: 444/ Bethesda Road

Delete Site

Policy: CE05

Map: Proposals Plan - West

Summary: Objection to the Environmental Space allocation at Bethesda Fields site

Item	Question	Representation Text	Soundness Test
2	2	Policy Number CE5	
4	4	The Proposals Map	Yes
11	11	Site Name Land at Bethesda Close, Rogerstone.	
12	12	Site Reference 53.C1	
14	14	Representation Environmental Spaces are described as "Sites having existing importance for their visual qualities, as wildlife habitats or for recreational or amenity purposes." Such Environmental Spaces are defined in the LDP Background Paper (February 2012) as Local Nature Reserves, SINCs, Ancient Woodlands, Commons and Village Greens, Accessible Natural Greenspace and Amenity Areas. The site is not publicly accessible and has none of the qualities which the above are associated with. Its inclusion within such an area is, therefore, objected to. The submission site is not publicly accessible and as such has no recreational value. One of the main reasons for designating such spaces, as stated in supporting paragraph 4.10 is their recreational value. Furthermore the development would not detrimentally affect the current landscape or biodiversity value, and would not result in severance of areas of biodiversity interest. The safeguarding of that part of the site which has some ecological value with the addition of the proposed enclosed play area would, therefore, represent an improvement in respect of play provision, whilst maintaining some of the site's open-ness. It is considered, therefore, that the inclusion of the site within an Environmental Space is not appropriate or justified by any firm evidence, but that in any event the proposals would accord with the provisions of Policy CE5 for the reasons given above. The Proposals Map is also objected to on the above basis. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site. Additional Information Submitted - Available on Request	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE2, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3090.D3//SP10	Herbert, Mr BC	Asbri Planning		24/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.21

Site:

Policy: SP10

Map: Constraints Plan - West

Summary: Objection to the inflexible nature of the brownfield strategy

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number SP10		
11	11	Site Name Land at Bethesda Close, Rogerstone		
12	12	Site Reference 53.C1		
14	14	Representation Policy SP10 – House Building Requirement, is objected to as the 'brownfield' led strategy in restricting appropriate levels of development in sustainable locations on suitable undeveloped sites within the urban area, with an emphasis on previously developed land, does not provide for a sufficient range and choice of housing. As such, the criteria should be extended to include appropriate development on open areas of land in the urban area, which are not required for amenity or recreation purposes and which have capacity to accommodate suitable housing schemes in preference to extending into the wider countryside. This point is expanded upon in the objections to Policy H1. The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site. Additional Information Submitted - Available on Request		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To put the case forward for the site's inclusion and to present evidence directly before the Inspector.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness CE2, CE4		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3091.D1//H15.02	Walters, Miss Amanda			27/06/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Objects to Queensway Meadows Gypsy and Traveller Transit Accomodation.

Item Question Representation Text

14 14 Representation

I am writing to you to register my objection to the above 'planned' Traveller Sites on Broadstreet Common and Queensway Meadows. (I understand that the 'official temporary' site at Queensway Meadows was opened without being subject to the planning process).

My main objections to Policies H15, H16 and H17 in the local development plan are as follows:-

- 1) Welsh Assembly Government guidelines say that Traveller Sites should not be in a flood plain. The proposed sites in Nash are!
- 2) Welsh Assembly Government guidelines state that such sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the existing infrastructure. One of these sites alone could include around 40 caravans and house more than 100 Travellers. There are only just over 200 electors on the Electoral Register for Nash village.
- 3) The two sites on Broadstreet Common are in or on the edge of an SSSI area. Has Newport Council gone against its work with the Countryside Council for Wales? (In 2010 we were informed that further land allocation for development in the SSSI area would be prevented).
- 4) Similarly Newport Council has refused Planning Consent for all new builds in the rural area.
- 5) There is no main sewerage facility for properties on Broadstreet Common. Will the Traveller Sites be connected to mains sewerage at ratepayers expense? If so, can this privilege be extended to the ratepayers on Broadstreet Common who do not at present enjoy it?
- 6) The areas of the proposed sites are surrounded by deep drainage ditches in which people have drowned over the years – hardly safe for younger Travellers! Also there are only 3 street lights along the length of Broadstreet Common. The Travellers Sites will bring even more traffic. Broadstreet Common is used morning and evening as a 'rat run' by "out of local area" traffic of people going to and from work.

There is a heavy haulage company operating from a site on Broadstreet Common using large articulated and rigid lorries.

Also, Broadstreet Common carries a constant and fairly heavy amount of articulated traffic. Hardly safe for young Travellers!

7) I note that none of our local councillors was involved in 'the whittling down' of the original list of possible site to these now presented to us – the Cabinet members who did the 'whittling' have no interest in other area of Newport – could this be another example of NIMBYISM?

Is there any point in having local councillors is they have no input into matters affecting "their 'people'"?

8) The access from the proposed Travellers Sites to schools, GPs etc. is surely not up to Welsh Assembly Government requirements, because of distance, lack of footpaths and lack of street lighting.

9) New housing is to be built for the settled community at Llanwern, Duffryn and

Allt-yr-yn – surely the plans for these new areas should include provision for the Travellers so that 'balanced' communities will be formed i.e. school places, GP's lists, and shops etc.

Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3091.D2//H16.02	Walters, Miss Amanda			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Wants Former Army Barracks, Pye Corner Gypsy and Traveller site removed from LDP

Item Question Representation Text

14 14 Representation

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- 1) Welsh Assembly Government guidelines say that Traveller Sites should not be in a flood plain. The proposed sites in Nash are!
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Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3091.D3//H16.03	Walters, Miss Amanda			14/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Map: Constraints Plan - East

Summary: Wants Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Come, removed from the LDP

Item Question Representation Text

14 14 Representation

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Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3091.D4//H17	Walters, Miss Amanda			27/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objects to Policy H17 and inclusion of Gypsy and Traveller sites in Nash and Queensway Meadows

Item Question Representation Text

14 14 Representation

I am writing to you to register my objection to the above 'planned' Traveller Sites on Broadstreet Common and Queensway Meadows. (I understand that the 'official temporary' site at Queensway Meadows was opened without being subject to the planning process).

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3093.D1//H15.02	Butcher, Miss Rosamond M.			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Objects to Queensway Meadows Gypsy Traveller site.

Item Question Representation Text

14 14 Representation

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Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3093.D2//H16.02 Butcher, Miss Rosamond M.

17/05/2012 P O M

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Objection to Gypsy and Traveller Residential Accommodation - Former Army Barracks, Pye Corner, Nash.

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3093.D3//H16.03	Butcher, Miss Rosamond M.			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Map: Constraints Plan - East

Summary: Objection to Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Corner, Nash

Item Question Representation Text

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3093.D4//H17	Butcher, Miss Rosamond M.			17/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Map: Constraints Plan - East

Summary: Objects to policy H17 and inclusion of Queensway Meadows and Pye Corner Gypsy and Traveller sites.

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3094.D1//H15.02	Curtis, Ms Lucy			28/06/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Wants Gypsy and Traveller Transit Accommodation - Queensway Meadows site deleted from LDP

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3094.D2//H16.02	Curtis, Ms Lucy			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Barracks, Pye Corner, Nash from LDP

Item Question Representation Text

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7) I note that none of our local councillors was involved in 'the whittling down' of the original list of possible site to these now presented to us – the Cabinet members who did the 'whittling' have no interest in other area of Newport – could this be another example of NIMBYISM?

Is there any point in having local councillors is they have no input into matters affecting "their 'people'"?

8) The access from the proposed Travellers Sites to schools, GPs etc. is surely not up to Welsh Assembly Government requirements, because of distance, lack of footpaths and lack of street lighting.

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Allt-yr-yn – surely the plans for these new areas should include provision for the Travellers so that 'balanced' communities will be formed i.e. school places, GP's lists, and shops etc.

Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3094.D3//H16.03	Curtis, Ms Lucy			17/05/2012	<input type="checkbox"/>	P	O		M	
Document: Deposit Plan, p.72		Site: 416/ Former Army Camp	Delete Site							
Policy: H16.03		Map: Constraints Plan - East								
Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Site, Pye Corner, Nash, from LDP										

Item Question Representation Text

14 14 Representation

I am writing to you to register my objection to the above 'planned' Traveller Sites on Broadstreet Common and Queensway Meadows. (I understand that the 'official temporary' site at Queensway Meadows was opened without being subject to the planning process).
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 Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?
 Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
 Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3094.D4//H17	Curtis, Ms Lucy			17/05/2012	<input type="checkbox"/>	P	O		M	

Policy: H17

Summary: Objects to inclusion of Gypsy and Traveller sites in Queensway Meadows and Nash

Item Question Representation Text

14 14 Representation

I am writing to you to register my objection to the above 'planned' Traveller Sites on Broadstreet Common and Queensway Meadows. (I understand that the 'official temporary' site at Queensway Meadows was opened without being subject to the planning process).

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3095.D1//H15.02	Curtis, Mr Adam			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Transit Accommodation - Queensway Meadows, from LDP

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3095.D2//H16.02	Curtis, Mr Adam			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Barracks, Pye Corner, Nash, from LDP

Item Question Representation Text

14 14 Representation

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Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3095.D3//H16.03	Curtis, Mr Adam			17/05/2012	<input type="checkbox"/>	P	O		M	
Document: Deposit Plan, p.72		Site: 416/ Former Army Camp	Delete Site							
Policy: H16.03										
Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Corner, Nash, from LDP										

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3095.D4//H17	Curtis, Mr Adam			17/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Wants Gypsy and Traveller sites in Queensway Meadows and Nash deleted from LDP

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3096.D1//H15.02	Curtis, Ms Emma			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Transit Accommodation - Queensway Meadows, from LDP.

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3096.D2//H16.02	Curtis, Ms Emma			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Barracks, Pye Corner, Nash, from LDP

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8) The access from the proposed Travellers Sites to schools, GPs etc. is surely not up to Welsh Assembly Government requirements, because of distance, lack of footpaths and lack of street lighting.

9) New housing is to be built for the settled community at Llanwern, Duffryn and

Allt-yr-yn – surely the plans for these new areas should include provision for the Travellers so that 'balanced' communities will be formed i.e. school places, GP's lists, and shops etc.

Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3096.D3//H16.03	Curtis, Ms Emma			17/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Corner, Nash, from LDP

Item Question Representation Text

14 14 Representation

I am writing to you to register my objection to the above 'planned' Traveller Sites on Broadstreet Common and Queensway Meadows. (I understand that the 'official temporary' site at Queensway Meadows was opened without being subject to the planning process).

My main objections to Policies H15, H16 and H17 in the local development plan are as follows:-

- 1) Welsh Assembly Government guidelines say that Traveller Sites should not be in a flood plan. The proposed sites in Nash are!
- 2) Welsh Assembly Government guidelines state that such sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the existing infrastructure. One of these sites alone could include around 40 caravans and house more than 100 Travellers. There are only just over 200 electors on the Electoral Register for Nash village.
- 3) The two sites on Broadstreet Common are in or on the edge of an SSSI area. Has Newport Council gone against its work with the Countryside Council for Wales? (In 2010 we were informed that further land allocation for development in the SSSI area would be prevented).
- 4) Similarly Newport Council has refused Planning Consent for all new builds in the rural area.
- 5) There is no main sewerage facility for properties on Broadstreet Common. Will the Traveller Sites be connected to mains sewerage at ratepayers expense? If so, can this privilege be extended to the ratepayers on Broadstreet Common who do not at present enjoy it?
- 6) The areas of the proposed sites are surrounded by deep drainage ditches in which people have drowned over the years – hardly safe for younger Travellers! Also there are only 3 street lights along the length of Broadstreet Common. The Travellers Sites will bring even more traffic. Broadstreet Common is used morning and evening as a 'rat run' by "out of local area" traffic of people going to and from work.

There is a heavy haulage company operating from a site on Broadstreet Common using large articulated and rigid lorries.

Also, Broadstreet Common carries a constant and fairly heavy amount of articulated traffic. Hardly safe for young Travellers!

7) I note that none of our local councillors was involved in 'the whittling down' of the original list of possible site to these now presented to us – the Cabinet members who did the 'whittling' have no interest in other area of Newport – could this be another example of NIMBYISM?

Is there any point in having local councillors is they have no input into matters affecting "their 'people'"?

8) The access from the proposed Travellers Sites to schools, GPs etc. is surely not up to Welsh Assembly Government requirements, because of distance, lack of footpaths and lack of street lighting.

9) New housing is to be built for the settled community at Llanwern, Duffryn and

Allt-yr-yn – surely the plans for these new areas should include provision for the Travellers so that 'balanced' communities will be formed i.e. school places, GP's lists, and shops etc.

Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3096.D4//H17	Curtis, Ms Emma			17/05/2012	<input type="checkbox"/>	P	O		M	

Policy: H17

Summary: Wants Gypsy and Traveller sites in Queensway Meadows and Nash be deleted from LDP

Item Question Representation Text

14 14 Representation

I am writing to you to register my objection to the above 'planned' Traveller Sites on Broadstreet Common and Queensway Meadows. (I understand that the 'official temporary' site at Queensway Meadows was opened without being subject to the planning process).

My main objections to Policies H15, H16 and H17 in the local development plan are as follows:-

- 1) Welsh Assembly Government guidelines say that Traveller Sites should not be in a flood plan. The proposed sites in Nash are!
- 2) Welsh Assembly Government guidelines state that such sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the existing infrastructure. One of these sites alone could include around 40 caravans and house more than 100 Travellers. There are only just over 200 electors on the Electoral Register for Nash village.
- 3) The two sites on Broadstreet Common are in or on the edge of an SSSI area. Has Newport Council gone against its work with the Countryside Council for Wales? (In 2010 we were informed that further land allocation for development in the SSSI area would be prevented).
- 4) Similarly Newport Council has refused Planning Consent for all new builds in the rural area.
- 5) There is no main sewerage facility for properties on Broadstreet Common. Will the Traveller Sites be connected to mains sewerage at ratepayers expense? If so, can this privilege be extended to the ratepayers on Broadstreet Common who do not at present enjoy it?
- 6) The areas of the proposed sites are surrounded by deep drainage ditches in which people have drowned over the years – hardly safe for younger Travellers! Also there are only 3 street lights along the length of Broadstreet Common. The Travellers Sites will bring even more traffic. Broadstreet Common is used morning and evening as a 'rat run' by "out of local area" traffic of people going to and from work.

There is a heavy haulage company operating from a site on Broadstreet Common using large articulated and rigid lorries.

Also, Broadstreet Common carries a constant and fairly heavy amount of articulated traffic. Hardly safe for young Travellers!

7) I note that none of our local councillors was involved in 'the whittling down' of the original list of possible site to these now presented to us – the Cabinet members who did the 'whittling' have no interest in other area of Newport – could this be another example of NIMBYISM?

Is there any point in having local councillors is they have no input into matters affecting "their 'people'"?

8) The access from the proposed Travellers Sites to schools, GPs etc. is surely not up to Welsh Assembly Government requirements, because of distance, lack of footpaths and lack of street lighting.

9) New housing is to be built for the settled community at Llanwern, Duffryn and

Allt-yr-yn – surely the plans for these new areas should include provision for the Travellers so that 'balanced' communities will be formed i.e. school places, GP's lists, and shops etc.

Newport Council has stated over the years that Nash will not be allowed any new accommodation for the settled community – why should Travellers be treated any differently to people who pay their dues to society?

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3097.D1//H15.02	Dixon, R			17/05/2012	<input type="checkbox"/>	P	O		M	

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Transit Accommodation - Queensway Meadows, from LDP

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to a WAG) guidelines state sites of important biodiversity should be avoided.
 - 2) No mains sewerage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.
 - 3) WAG guidelines state that sites should not be on a flood plain.
 - 4) Chosen areas should have a safe play are for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
 - 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.
- These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3097.D2//H16.02	Dixon, R			28/06/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Barracks, Pye Corner, Nash, from LDP

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to a WAG) guidelines state sites of important biodiversity should be avoided.
 - 2) No mains sewerage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.
 - 3) WAG guidelines state that sites should not be on a flood plain.
 - 4) Chosen areas should have a safe play are for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
 - 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.
- These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3097.D3//H16.03	Dixon, R			16/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Corner, Nash, from LDP

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to as WAG) guidelines state sites of important biodiversity should be avoided.
 - 2) No mains sewerage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.
 - 3) WAG guidelines state that sites should not be on a flood plain.
 - 4) Chosen areas should have a safe play area for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
 - 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.
- These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3097.D4//H17	Dixon, R			16/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Map: Constraints Plan - East

Summary: Objects to inclusion of Gypsy and Traveller sites in Nash, Whitson and Goldcliff parishes

Item Question Representation Text

14 14 Representation

I wish to formally raise objectives to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

- 1) One of the proposed sites is in the middle of an SSSI area with one also on the edge of The Welsh Assembly Government (hereafter and referred to a WAG) guidelines state sites of important biodiversity should be avoided.
 - 2) No mains sewerage facilities exist in Broadstreet Common. Therefore this would involve an extra expense to the ratepayer.
 - 3) WAG guidelines state that sites should not be on a flood plain.
 - 4) Chosen areas should have a safe play are for children. The three parishes have a network of drainage reens which pose a significant hazard to children.
 - 5) The Travellers should also have easy and safe access to school, GPs etc preferably reachable on foot. I would like to point out there is no street lighting on Broadstreet Common or pavements to reach the infrastructure.
 - 6) WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.
- These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3098.D1//H16.03	Cornelius, Mrs Lesley			16/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Issue: Infrastructure

Summary: Objection to proposed Gypsy and Traveller site at Broadstreet Common.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
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2	2	Policy Number	
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H15, H16, H17

4	4	The Proposals Map	Yes
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Yes

14	14	Representation	
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I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

1) Welsh Government guidelines clearly state that such sites should not be in a flood plain.

2) The two sites on Broadstreet Common are within the or very close to an SSSI.

3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village. Such developments would have an adverse impact on the rural landscape.

4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).

5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are just over 200 electors shown on the Electoral Register for Nash Village.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and because there is no main sewerage in parts of the village.

15	15	Do you want to speak at Public Examination?	No
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No

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
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1	1	I think the LDP is sound.	No
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No

<i>Item</i>	<i>Question</i>	<i>Tick-box reply</i>
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10	10	Delete an existing site.	Yes
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Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3098.D2//H16.02	Cornelius, Mrs Lesley			15/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to the proposed Gypsy Sites at Broadstreet Common

Item	Question	Representation Text	Response
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2	2	Policy Number H15,H16,H17	
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4	4	The Proposals Map	Yes
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14	14	Representation	
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I write to object to the proposals for three gypsy/traveller sites within our local community of Nash: two on Broadstreet Common and one on Queensway Meadows. The main reasons are: 1. The Welsh Government (WG) guidelines state that sites should not be placed on a flood plain. 2. The two sites on Broadstreet Common are within or very close to an SSSI. 3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village. Such developments would have an adverse impact on the rural landscape. 4. The two sites on Broadstreet Common are adjacent to deep reens which pose a drowning threat to gypsy/traveller children. In recent years an adult drowned in the reen adjacent to these sites. 5. WG guidelines state that sites should respect the scale of the area and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, housing more than 100 people. There are just over 200 electors on the Electoral Role for Nash Village. 6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport County's policy of not allowing development within the flood plain or outside the environs of the village, and because there is no mains sewerage in parts of the village.

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	No
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Item	Question	Response
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3098.D3//H15.02	Cornelius, Mrs Lesley			15/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to the proposed Gypsy and Traveller site at Queensway Meadows

Item	Question	Representation Text	Response
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2	2	Policy Number H15,H16,H17	
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4	4	The Proposals Map	Yes
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14	14	Representation	
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I write to object to the proposals for three gypsy/traveller sites within our local community of Nash: two on Broadstreet Common and one on Queensway Meadows. The main reasons are: 1. The Welsh Government (WG) guidelines state that sites should not be placed on a flood plain. 2. The two sites on Broadstreet Common are within or very close to an SSSI. 3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village. Such developments would have an adverse impact on the rural landscape. 4. The two sites on Broadstreet Common are adjacent to deep reens which pose a drowning threat to gypsy/traveller children. In recent years an adult drowned in the reen adjacent to these sites. 5. WG guidelines state that sites should respect the scale of the area and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, housing more than 100 people. There are just over 200 electors on the Electoral Role for Nash Village. 6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport County's policy of not allowing development within the flood plain or outside the environs of the village, and because there is no mains sewerage in parts of the village.

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	No
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Item	Question	Response
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10	10	Delete an existing site.	Yes
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3098.D4//H17	Cornelius, Mrs Lesley			15/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to Policy H17 Gypsy and Traveller Accommodation Proposals

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number H15,H16,H17		
4	4	The Proposals Map		Yes
14	14	Representation I write to object to the proposals for three gypsy/traveller sites within our local community of Nash: two on Broadstreet Common and one on Queensway Meadows. The main reasons are: 1. The Welsh Government (WG) guidelines state that sites should not be placed on a flood plain. 2. The two sites on Broadstreet Common are within or very close to an SSSI. 3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village. Such developments would have an adverse impact on the rural landscape. 4. The two sites on Broadstreet Common are adjacent to deep reens which pose a drowning threat to gypsy/traveller children. In recent years an adult drowned in the reen adjacent to these sites. 5. WG guidelines state that sites should respect the scale of the area and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, housing more than 100 people. There are just over 200 electors on the Electoral Role for Nash Village. 6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport County's policy of not allowing development within the flood plain or outside the environs of the village, and because there is no mains sewerage in parts of the village.		
15	15	Do you want to speak at Public Examination?		Neither
1	1	I think the LDP is sound.		No
10	10	Delete an existing site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3099.D1	Hollyman, Mr Stephen			14/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.0

Site: 377/ St Peters Crescent

Boundary Change

Map: Inset 3: Peterstone Village Boundary

Summary: Objection to the boundary as it conflicts with the curtilage purchased with this property.

Item Question Representation Text

5 5 Inset Plan(s) Yes

9 9 Amend the boundaries of an existing site. Yes

11 11 Site Name
Ynyswen, St Peters Crescent, Peterstone.

14 14 Representation
The land attached to my property has been used by us as part of our curtilage since we purchased it along with the property. The natural boundary to the village should be along the public footpath which is west and runs south to north of our property. This area should be included within our curtilage.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. No

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3106.D1//H16.02	Anderson, Ms Fiona			03/07/2012	<input type="checkbox"/>	E	O		M	

Council Officer: MS

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to site - does not conform with WAG guidance - Former Army Barracks, Pye Corner, Nash.

Item Question Representation Text

14 14 Representation

Dear Sirs,

I am writing in reference to the proposed Traveller/Gypsy Sites of the two on Broadstreet Common and one on Queensway Meadows, H15, H16 and H17. Myself and partner, Mr Nicholas Josham live in Nash Village and we both object to these sites due to they do not meet the criteria laid down by the Welsh Government.

The Welsh Government guidelines state the sites should not be in a flood plain, which the sites in Nash are. The areas suggested are clearly unsuitable for any sort of development, in particular caravans and mobile type homes as the area is at risk of flooding. There are deep reens which pose a drowning danger, especially to children, in recent years an adult drowned in one of these reens adjacent to these sites.

The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one. Welsh Government say sites of important biodiversity should be avoided. We have been advised by Countryside Council for Wales that the council is working with Newport Council to prevent further land allocation for development with the SSSI site.

There is no street lighting, no mains water and residents have been refused planning permission for any new builds for many years because of Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village and there is no mains sewerage in parts of the villiage. To build a mains sewerage infrastructure on Broadstreet Common, this will involve the ratepayer and Newport City Council extra expense if these sites are chosen. We have been advised Travellers should have easy access to schools and GP surgeries, preferably by foot, as the highway is unsafe and no street lighting therefore not within safe walking distance.

Guidance also states that siting travellers on the edge of settled community is to be avoided. Also Welsh Government guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure. Oln of these sites alone could include around 40 caravans and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village. Such developments would have an adverse impact on the rural landscape.

Welsh Government guidelines state that Planning Authorities should have regard for potential noise and other disturbance from movement of vehicles to from site, and from potential on-site business activities. The site at the old army camp is directly opposite two residential properties within 20 metres of their front gates. One site on Broadstreet Common is in private ownership and used by an agricultural contractor who is one of the largest employers in the village, the compulsory purchase of this site will be expensive to the ratepayer and will involve the relocation of the business and employees, possible outside the village.

Also you have already placed an 'official' temporary site at Queensway Meadows without going through the planning process.

With the above points myself and Nicholas Josham stress that we are against Newport Council as you have not supported the Welsh Governments new guidance on the responsible siting of travellers and gypsies.

This objection clearly shows that these sites do not fit in with the criteria laid down by the Welsh Government and therefore unsuitable.

15 15 Do you want to speak at Public Examination?

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3106.D2//H16.03	Anderson, Ms Fiona			03/07/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to site - does not conform with WAG guidance - Former Army Camp Site, Pye Corner, Nash.

Item Question Representation Text

14 14 Representation

Dear Sirs,

I am writing in reference to the proposed Traveller/Gypsy Sites of the two on Broadstreet Common and one on Queensway Meadows, H15, H16 and H17. Myself and partner, Mr Nicholas Josham live in Nash Village and we both object to these sites due to they do not meet the criteria laid down by the Welsh Government.

The Welsh Government guidelines state the sites should not be in a flood plain, which the sites in Nash are. The areas suggested are clearly unsuitable for any sort of development, in particular caravans and mobile type homes as the area is at risk of flooding. There are deep reens which pose a drowning danger, especially to children, in recent years an adult drowned in one of these reens adjacent to these sites.

The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one. Welsh Government say sites of important biodiversity should be avoided. We have been advised by Countryside Council for Wales that the council is working with Newport Council to prevent further land allocation for development with the SSSI site.

There is no street lighting, no mains water and residents have been refused planning permission for any new builds for many years because of Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village and there is no mains sewerage in parts of the villiage. To build a mains sewerage infrastructure on Broadstreet Common, this will involve the ratepayer and Newport City Council extra expense if these sites are chosen. We have been advised Travellers should have easy access to schools and GP surgeries, preferably by foot, as the highway is unsafe and no street lighting therefore not within safe walking distance.

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With the above points myself and Nicholas Josham stress that we are against Newport Council as you have not supported the Welsh Governments new guidance on the responsible siting of travellers and gypsies.

This objection clearly shows that these sites do not fit in with the criteria laid down by the Welsh Government and therefore unsuitable.

15 15 Do you want to speak at Public Examination?

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3106.D3//H15.02	Anderson, Ms Fiona			03/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection as site does not conform with WAG guidance - Queensway Meadows.

Item Question Representation Text

14 14 Representation

Dear Sirs,

I am writing in reference to the proposed Traveller/Gypsy Sites of the two on Broadstreet Common and one on Queensway Meadows, H15, H16 and H17. Myself and partner, Mr Nicholas Josham live in Nash Village and we both object to these sites due to they do not meet the criteria laid down by the Welsh Government.

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This objection clearly shows that these sites do not fit in with the criteria laid down by the Welsh Government and therefore unsuitable.

15 15 Do you want to speak at Public Examination?

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3106.D4//H17	Anderson, Ms Fiona			20/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objects to Policy H17 of the deposit LDP

Item Question Representation Text

14 14 Representation

Dear Sirs,

I am writing in reference to the proposed Traveller/Gypsy Sites of the two on Broadstreet Common and one on Queensway Meadows, H15, H16 and H17. Myself and partner, Mr Nicholas Josham live in Nash Village and we both object to these sites due to they do not meet the criteria laid down by the Welsh Government.

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With the above points myself and Nicholas Josham stress that we are against Newport Council as you have not supported the Welsh Governments new guidance on the responsible siting of travellers and gypsies.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
1 1	I think the LDP is sound. Not Ticked		Neither							

3107.D1//SP01	Evans, Mr Simon			03/07/2012	<input type="checkbox"/>				M	
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Document:Deposit Plan, p.14

Policy: SP01

Summary: Supports the use of brown field site, rather than green belt/green wedges surrounding Marshfield

Item Question Representation Text

14 14 Representation
I wish to record my support for the proposals, notably:

1. Support of the use of brown field sites, rather than green belt and green wedge surrounding Marshfield.

15 15	Do you want to speak at Public Examination?		Neither							
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Item Question Soundness Test

1 1	I think the LDP is sound.		Neither							
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3107.D2//SP16	Evans, Mr Simon			03/07/2012	<input type="checkbox"/>				M	
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Document:Deposit Plan, p.27

Policy: SP16

Summary: Supports the inclusion of the Duffryn Link Road

Item Question Representation Text

14 14 Representation

I wish to record my support for the proposals, notably:

2. Support of the inclusion of the Duffryn Link Road

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

3107.D3//H01.54	Evans, Mr Simon				<input type="checkbox"/>				M	
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Document:Deposit Plan, p.64

Policy: H01.54

Summary: Supports inclusion of former Alcan site - however, does not want any changes to Marshfield school catchments

Item Question Representation Text

14 14 Representation

I wish also to note my support for the inclusion of the former Alcan site at Rogerstone. However, at present Marshfield enjoys the benefit of falling into the catchment of Bassaleg School. It would not be acceptable if the development at Rogerstone adversely affected schooling of children within Marshfield. The development at Rogerstone should be phased with new schooling to ensure that no changes to catchment need to be made.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3108.D1//H15	Ray, Mr Shaun			03/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Policy: H15

Summary: Objects to policies H15, H16 and H17

Item Question *Representation Text*

14 14 Representation

I am objecting to policies H15, H16 and H17. *Your website at 11.15am blocked my attempts to fill in the consultation document online, hence this hardcopy letter.* *Ideally, I would like all 3 separate sections on travellers removed from the plan* and consideration for their accommodation considered and documented in the same as all other cultures in our society (save the specific design of a traveller dwelling) AS PER WAG GUIDELINES.

Overall I believe that with the inclusion of separate statements for travellers, the Plan has contradictions in regard to 1.30 the planning of houses, brownfield sites and the protection of the countryside. WAG states that 'accommodation' for the travelling community must be considered in the same manner as accommodation for the settled community, however the two appear in the Plan as separate issues. Therefore it appears that Newport Planners have not understood the guidance of WAG and this could have serious implications for the future of government funding for travellers in Newport.

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3108.D3//H17	Ray, Mr Shaun			03/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objections to H15, H16, H17

Item Question Representation Text

14 14 Representation

I am objecting to policies H15, H16 and H17. *Your website at 11.15am blocked my attempts to fill in the consultation document online, hence this hardcopy letter.* *Ideally, I would like all 3 separate sections on travellers removed from the plan* and consideration for their accommodation considered and documented in the same as all other cultures in our society (save the specific design of a traveller dwelling) AS PER WAG GUIDELINES.

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If all three sections remain in the Plan then my suggested amendments are..

*H17 *5.32 *.... it may be that suitable sites are located in rural or semi-rural settings...* It is my understanding that placing travellers on the edges of the community is to be avoided at all cost in the future. PLEASE

CAN THIS STATEMENT BE CHECKED FOR FACTUAL ACCURACY AGAINST WAG GUIDELINES AND IF FOUND, AS I BELIEVE TO BE COMPLETELY INCORRECT, REMOVED FROM THE PLAN. WAG guidelines are written to ensure that the old tensions between the settled and traveller communities are avoided in the future. This statement only serves to perpetuate old tensions and does not sit well with the Plans vision statement 1.36 designing out crime. (. by this I mean that in dark rural locations crimes are more easily committed and have historically been blamed on the poor travellers. The guidelines urge councils to consider the siting of travellers differently to the past to improve the future)**

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3108.D4//H16.02	Ray, Mr Shaun			03/07/2012	<input type="checkbox"/>	P	O		M	
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Document:Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection due to being in the flood plain - Former Army Barracks, Pye Corner, Nash.

Item Question Representation Text

14 14 Representation

*H16 *Sites (II) and (III) at Pye Corner are completely unsuitable for travellers as the sites are in flood plains and this is in total conflict with SP3 of the Plan.**

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

3108.D5//H16.03	Ray, Mr Shaun			03/07/2012	<input type="checkbox"/>	E	O		M	
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03/07/2012

E

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M

Document:Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection due to being in the flood plain - Former Army Camp Site, Pye Corner, Nash.

Item Question Representation Text

14 14 Representation

*H16 *Sites (II) and (III) at Pye Corner are completely unsuitable for travellers as the sites are in flood plains and this is in total conflict with SP3 of the Plan.**

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3108.D6//H15.02	Ray, Mr Shaun			03/07/2012	<input type="checkbox"/>		O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection due to location on Industrial site/SSSI - Queensway Meadows.

Item Question Representation Text

14 14 Representation

*H15 *(II) Queensway meadows. This is an industrial site. WAG guidelines make it clear that travellers must not be put on the fringes of the community and this site must be struck from the Plan.**

4.51 of the Plan documents the importance of the Gwent Levels. Siting travellers in SSSI sites is totally contradictory to the Plans vision statement 1.34 which desires facilities for the city's health, welfare, spiritual, educational and leisure.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

3108.D7//H16	Ray, Mr Shaun			03/07/2012	<input type="checkbox"/>	E			M	
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Document: Deposit Plan, p.72

Policy: H16

Summary: Gateway to Wales should not include 3 traveller sites

Item Question Representation Text

14 14 Representation

*The Plan's vision for the EAST of the city recognises it as the gateway to the whole of Wales. Why would anyone wish then dominate the vision of visitors with three traveller sites that go against all sensible guidelines and as a result destroys any opportunity to improve the future relations between the travelling and settled communities for many years to come. *

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3109.D1//H15.02	Welsh, Mr & Mrs Andrew & Martine			03/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to Policies H15, H16 and H17

Item Question Representation Text

14 14 Representation
Rep. 3109

I wish to formally raise objections to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

Welsh Assembly Government (WAG) guidelines state that sites should not be on a flood plain.

WAG guidelines state sites of important biodiversity should be avoided: Two of the proposed sites is in the middle of SSSI with another bordering this.

No mains sewerage facilities exist in Broadstreet Common therefore involving additional cost to the rate payer.

Chosen areas should have a safe play area for Traveller children. The three sites in question are surrounded by a network of reens posing a considerable hazard to children.

Chosen areas should have easy and safe access to school, GPs etc preferably reachable on foot. There is no street lighting on Broadstreet Common or pavements to reach the infrastructure.

The 2 sites within Broadstreet Common are within rural area and outside the environs of the village and such developments would have adverse impact of the rural landscape.

WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.

There are only just over 200 electors shown on the Electoral Register for Nash Village.

Residents of Nash have been refused planning permission for ANY new build property and under scrutiny for Home Improvement Extensions for many years because of Newport City Council's policy of not allowing development; within a flood plain, no mains sewerage, highway infrastructure, or outside the environs of the village – all of which in disregard if consent is granted.

These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3109.D2//H16.02	Welsh, Mr & Mrs Andrew & Martine			03/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

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Delete Site

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Item Question Representation Text

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15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3109.D3//H17	Welsh, Mr & Mrs Andrew & Martine			03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to H15, H16 and H17

Item Question Representation Text

14 14 Representation
Rep. 3109

I wish to formally raise objections to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows.

Welsh Assembly Government (WAG) guidelines state that sites should not be on a flood plain.

WAG guidelines state sites of important biodiversity should be avoided: Two of the proposed sites is in the middle of SSSI with another bordering this.

No mains sewerage facilities exist in Broadstreet Common therefore involving additional cost to the rate payer.

Chosen areas should have a safe play area for Traveller children. The three sites in question are surrounded by a network of reens posing a considerable hazard to children.

Chosen areas should have easy and safe access to school, GPs etc preferably reachable on foot. There is no street lighting on Broadstreet Common or pavements to reach the infrastructure.

The 2 sites within Broadstreet Common are within rural area and outside the environs of the village and such developments would have adverse impact of the rural landscape.

WAG guidelines state that the sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure.

There are only just over 200 electors shown on the Electoral Register for Nash Village.

Residents of Nash have been refused planning permission for ANY new build property and under scrutiny for Home Improvement Extensions for many years because of Newport City Council's policy of not allowing development; within a flood plain, no mains sewerage, highway infrastructure, or outside the environs of the village – all of which in disregard if consent is granted.

These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3109.D4/H16.03	Welsh, Mr & Mrs Andrew & Martine			21/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objects to Policy H16 (iii) of the deposit LDP

Item Question Representation Text

14 14 Representation

I wish to formally raise objections to the proposed Travellers Sites within the three parishes of Nash, Whitson and Goldcliff Policies H15, H16 and H17 my reasons for objecting are as follows. Welsh Assembly Government (WAG) guidelines state that sites should not be on a flood plain.

WAG guidelines state sites of important biodiversity should be avoided: Two of the proposed sites is in the middle of SSSI with another bordering this.

No mains sewerage facilities exist in Broadstreet Common therefore involving additional cost to the rate payer.

Chosen areas should have a safe play area for Traveller children. The three sites in question are surrounded by a network of reens posing a considerable hazard to children.

Chosen areas should have easy and safe access to school, GPs etc preferably reachable on foot. There is no street lighting on Broadstreet Common or pavements to reach the infrastructure.

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Residents of Nash have been refused planning permission for ANY new build property and under scrutiny for Home Improvement Extensions for many years because of Newport City Council's policy of not allowing development; within a flood plain, no mains sewerage, highway infrastructure, or outside the environs of the village – all of which in disregard if consent is granted.

These are my objections please take them into consideration before making your decision.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3110.D1//H15.02	Bowen, Mr & Mrs W & CG			03/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection of 3 gypsy sites within community of Nash

Item	Question	Representation Text	Soundness Test
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14	14	Representation Rep. 3110	
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I wish in objection to the proposed 3 Gypsy Sites within our local community of Nash which I find incredulous when viewed alongside Welsh Gob, Recommendations on this issue namely...

They should not be on a flood plain... Nash is!

They should not be within an SSSI

They will have an adverse impact on the rural landscape

They are surrounded by reens which create a danger for children

The scale of these sites will dominate the existing community

The contradiction in planning where local residents have been refused over the years where now this is simply being overlooked

The obvious devaluation of properties within Nash as a result of these proposals. I have contacted a solicitor who has recommended I have my property value pre-site should they go ahead, and post development, and any devaluation which would then inevitably be as a consequence of this. He would then initiate proceeding against the council for compensation.

I have no objection to the principle of travellers sites but feel Nash represents a totally inappropriate location and as a community we will do everything within our power to prevent this happening.

15	15	Do you want to speak at Public Examination?	
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Neither

Item	Question	Soundness Test
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1	1	I think the LDP is sound.	
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Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3110.D2//H16.02	Bowen, Mr & Mrs W & CG			03/07/2012	<input type="checkbox"/>	P	O		M	

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to 3 gypsy sites within Nash community

Item Question Representation Text

14 14 Representation
Rep. 3110

I wish in objection to the proposed 3 Gypsy Sites within our local community of Nash which I find incredulous when viewed alongside Welsh Gob, Recommendations on this issue namely...

They should not be on a flood plain... Nash is!

They should not be within an SSSI

They will have an adverse impact on the rural landscape

They are surrounded by reens which create a danger for children

The scale of these sites will dominate the existing community

The contradiction in planning where local residents have been refused over the years where now this is simply being overlooked

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I have no objection to the principle of travellers sites but feel Nash represents a totally inappropriate location and as a community we will do everything within our power to prevent this happening.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3110.D3//H16.03	Bowen, Mr & Mrs W & CG			03/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to 3 gypsy sites within Nash community

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Response</i>
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14	14	Representation Rep. 3110	
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I wish in objection to the proposed 3 Gypsy Sites within our local community of Nash which I find incredulous when viewed alongside Welsh Gob, Recommendations on this issue namely...

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I have no objection to the principle of travellers sites but feel Nash represents a totally inappropriate location and as a community we will do everything within our power to prevent this happening.

15	15	Do you want to speak at Public Examination?	Neither
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Response</i>
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1	1	I think the LDP is sound.	Neither
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3111.D2//H15.02	Sadler, Mr & Mrs D			03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation
Rep. 3111

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

1) Welsh Government guidelines clearly state that such sites should not be in a flood plain.

2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one.

3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.

4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).

5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3111.D3//H16.02	Sadler, Mr & Mrs D			03/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to Policies H15, H16 and H17

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
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14	14	Representation Rep. 3111
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I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

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4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).

5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15	15	Do you want to speak at Public Examination?	Neither
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	Neither
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3111.D4//H17	Sadler, Mr & Mrs D			03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection against policies H15, H16 and H17

Item Question *Representation Text*

14 14 Representation
Rep. 3111

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

1) Welsh Government guidelines clearly state that such sites should not be in a flood plain.

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15 15 Do you want to speak at Public Examination? Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound. Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3111.D5//H16.03	Sadler, Mr & Mrs D			21/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objects to Policy H16 (iii) of the deposit LDP.

Item Question Representation Text

14 14 Representation

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

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2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one.

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5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.

6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3112.D1//H15.02	Jones, Mrs & Ms J & L			03/07/2012	<input type="checkbox"/>	P	O		M	

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation
Rep. 3111

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

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6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3112.D2//H16.02	Jones, Mrs & Ms J & L			03/07/2012	<input type="checkbox"/>	P	O		M	

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to Policy H15, H16 and H17

Item Question Representation Text

14 14 Representation
Rep. 3111

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

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6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3112.D3//H17	Jones, Mrs & Ms J & L			03/07/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to Policy H15, H16 and H17

Item Question Representation Text

14 14 Representation
Rep. 3111

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash.

The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

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6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination? Neither

Item Question Soundness Test

1 1 I think the LDP is sound. Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3112.D4/H16.03	Jones, Mrs & Ms J & L			21/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Delete site H16 (iii) from the deposit LDP

Item Question Representation Text

14 14 Representation

I wish to submit a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash. The main reasons for objections against Policies H15, H16 and H17 in the Local Development Plan area follows;

- 1) Welsh Government guidelines clearly state that such sites should not be in a flood plain.
- 2) The two sites on Broadstreet Common are in the middle of an SSSI area or on the edge of one.
- 3) The two sites on Broadstreet Common are within the rural area and outside the environs of the village, such developments would have an adverse impact on the rural landscape.
- 4) The sites on Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites).
- 5) Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.
- 6) Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy not allowing development within the flood plain or outside the environs of the village, and that there is no main sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3121.D1//H15.02	Alan R Jones & Sons			03/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to policies H15, H16 and H17

Item	Question	Representation Text
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14	14	Representation
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Letter of objection for proposed Travellers Sites in Nash village and Queensway Meadows. I would like to object to the proposed planning application in the LDP I am a resident in the Nash village and an owner of a business adjacent to the plot on Queensway Meadows, my objection are the proposed site conflict with the Welsh office guideline Policies H15, H16 and H17.

The guidelines clearly state that such sites should not be in a flood plain, and they are.

The two sites in Nash are in or on the edge of an SSSI.

The two sites in Nash are outside the village environs, and would have a huge impact on the rural landscape.

There are also concerns about the deep reens that criss cross the levels and the risk of children drowning.

Sites of this size would dominate the local area and put undue pressure on the limited infrastructure. Nash has only 200 electors and plans say 100 travellers may be there.

The residents have been refused planning permission in the past due to lack of main drainage and being on a flood plain and also not being infill.

My main objection with the Queensway Meadows Site is, as a business adjacent to the proposed site, is that it is on an industrial estate which is not suitable for residential purposes.

My own company runs a fleet of heavy vehicles which run 24hrs a day 7 days a week we have upwards of 80 vehicle movements a day. The travellers are very likely to complain when having to put up with disruption on this scale and find it difficult living next to busy companies who are endeavouring to maintain viable business, furthermore there is the safety of children playing in an Heavy industrial area such as this.

A site of this size would have a detrimental effect on many businesses in this vicinity. From a personal perspective my staff had to work very hard to establish a professional reliable service which we have. Customers visiting our site have to drive past the remains of Able Skips site and the disgusting rubbish that is still a blight on the area, Companies are struggling to survive in this time of economic downturn and any residential development within this area might influence potential or existing customers, first impressions are key in business today, which could put business and jobs at risk.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	Neither
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3121.D2//H16	Alan R Jones & Sons			03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

[Delete Site](#)

Policy: H16

Summary: Objection to Policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Letter of objection for proposed Travellers Sites in Nash village and Queensway Meadows. I would like to object to the proposed planning application in the LDP I am a resident in the Nash village and an owner of a business adjacent to the plot on Queensway Meadows, my objection are the proposed site conflict with the Welsh office guideline Policies H15, H16 and H17.

The guidelines clearly state that such sites should not be in a flood plain, and they are.

The two sites in Nash are in or on the edge of an SSSI.

The two sites in Nash are outside the village environs, and would have a huge impact on the rural landscape.

There are also concerns about the deep reens that criss cross the levels and the risk of children drowning.

Sites of this size would dominate the local area and put undue pressure on the limited infrastructure. Nash has only 200 electors and plans say 100 travellers may be there.

The residents have been refused planning permission in the past due to lack of main drainage and being on a flood plain and also not being infill.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3121.D3//H17	Alan R Jones & Sons			03/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to Policy H15, H16, H17

Item Question Representation Text

14 14 Representation

Letter of objection for proposed Travellers Sites in Nash village and Queensway Meadows. I would like to object to the proposed planning application in the LDP I am a resident in the Nash village and an owner of a business adjacent to the plot on Queensway Meadows, my objection are the proposed site conflict with the Welsh office guideline Policies H15, H16 and H17.

The guidelines clearly state that such sites should not be in a flood plain, and they are.

The two sites in Nash are in or on the edge of an SSSI.

The two sites in Nash are outside the village environs, and would have a huge impact on the rural landscape.

There are also concerns about the deep reens that criss cross the levels and the risk of children drowning.

Sites of this size would dominate the local area and put undue pressure on the limited infrastructure. Nash has only 200 electors and plans say 100 travellers may be there.

The residents have been refused planning permission in the past due to lack of main drainage and being on a flood plain and also not being infill.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3142.D1//H15.02	Phillips, Dr A L			03/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection against policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Re:- Newport local development plan.
Objections against policies H15, H16, H17.

I wish to raise the strongest objection to the proposed Gypsy site on Broadstreet Common Nash village, for the following reasons.

(A) Welsh Government guidelines stipulate that there should not be in or on a Flood Plain.

(B) The sites proposed are in or near to an area of SSSI.

(C) The sites are near the environment of the village and would have an adverse impact upon the village and the landscape.

(D) The sites are very close to deep reens, there have been fatalities over the years and I do not wish this to be repeated.

(E) The Welsh Government guidelines again stipulate that sites should not be so large as to over-burden the nearest settled community, and the local infrastructure, it is proposed that 40 caravans be placed on the site with a population of over 100 people therein, there are only approximately 200 people on the Nash Electoral register, so an imbalance would be caused.

(F) Over the past years, residents of Nash have been refused planning permission within the area for any new builds or alterations because Nash and its environs is situated on a FLOOD PLAIN (This has been and IS Newport City Council policy).
Added to this there are many parts of the village that have NO mains sewerage.

I place this objection before you for your earnest consideration.

15 15	Do you want to speak at Public Examination?	Neither
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Item Question Soundness Test

1 1	I think the LDP is sound.	Neither
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3142.D2//H16.02	Phillips, Dr A L			03/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objections to policy H15, H17 and H18

Item Question Representation Text

14 14 Representation

Re:- Newport local development plan.
Objections against policies H15, H16, H17.

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(E) The Welsh Government guidelines again stipulate that sites should not be so large as to over-burden the nearest settled community, and the local infrastructure, it is proposed that 40 caravans be placed on the site with a population of over 100 people therein, there are only approximately 200 people on the Nash Electoral register, so an imbalance would be caused.

(F) Over the past years, residents of Nash have been refused planning permission within the area for any new builds or alterations because Nash and its environs is situated on a FLOOD PLAIN (This has been and IS Newport City Council policy).
Added to this there are many parts of the village that have NO mains sewerage.

I place this objection before you for your earnest consideration.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3142.D3//H17	Phillips, Dr A L			03/07/2012	<input type="checkbox"/>	E	O		M	

Policy: H17

Summary: Objections to Policy H15, H16 and H17

Item Question Representation Text

14 14 Representation

Re:- Newport local development plan.
Objections against policies H15, H16, H17.

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(E) The Welsh Government guidelines again stipulate that sites should not be so large as to over-burden the nearest settled community, and the local infrastructure, it is proposed that 40 caravans be placed on the site with a population of over 100 people therein, there are only approximately 200 people on the Nash Electoral register, so an imbalance would be caused.

(F) Over the past years, residents of Nash have been refused planning permission within the area for any new builds or alterations because Nash and its environs is situated on a FLOOD PLAIN (This has been and IS Newport City Council policy).
Added to this there are many parts of the village that have NO mains sewerage.

I place this objection before you for your earnest consideration.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3142.D4//H16.03	Phillips, Dr A L			01/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Delete site H16 (iii) from deposit LDP

Item Question Representation Text

14 14 Representation

Re:- Newport local development plan.
Objections against policies H15, H16, H17.

I wish to raise the strongest objection to the proposed Gypsy site on Broadstreet Common Nash village, for the following reasons.

(A) Welsh Government guidelines stipulate that there should not be in or on a Flood Plain.

(B) The sites proposed are in or near to an area of SSSI.

(C) The sites are near the environment of the village and would have an adverse impact upon the village and the landscape.

(D) The sites are very close to deep reens, there have been fatalities over the years and I do not wish this to be repeated.

(E) The Welsh Government guidelines again stipulate that sites should not be so large as to over-burden the nearest settled community, and the local infrastructure, it is proposed that 40 caravans be placed on the site with a population of over 100 people therein, there are only approximately 200 people on the Nash Electoral register, so an imbalance would be caused.

(F) Over the past years, residents of Nash have been refused planning permission within the area for any new builds or alterations because Nash and its environs is situated on a FLOOD PLAIN (This has been and IS Newport City Council policy).
Added to this there are many parts of the village that have NO mains sewerage.

I place this objection before you for your earnest consideration.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3150.D1//H15	Jones, Mr David			23/05/2012	<input type="checkbox"/>	E	P		M	

Document: Deposit Plan, p.71

Site: 292/ Adj. Newport Saracens Rugby Club

New Site

Policy: H15

Summary: Proposing new Traveller site at land adjacent to Newport Saracens Rugby Club

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

It is not absolutely clear if the "Land adjacent to Newport Saracens" is the same land parcel that I have indicated on the attached scanned marked up plan but I believe it was? However from the originally proposed list of alternatives it is clear that the objections to the site were "Flood risk and adjacent to a dual carriageway and railway line.

I address each point as follows:

1) Flood Risk

The land can be simply filled up to the level of the proposed future Dyffryn Link Road as the road will have to run on embankment to meet up with the existing spur off the roundabout. The level of the development will then be above the river flood plain. In fact it is only the bank adjacent and alongside the river is in fact subject to flooding. The existing river bank erosion can also be prevented as part of the construction by the use of gabions and reno mattresses for any slopes still subject to flooding. As the land is not in the coastal flood plain no compensatory flood volume is required. A great deal of the work carried out for the "Traveller Site" will have to be carried out for the new road anyway.

2) Adjacent to a dual carriageway

There already exists a spur which is used by the Saracens rugby club. In the future when and if the Duffryn Link road is built to connect to this spur then the same accommodation to link to the new road will have to be similarly made. There is good and safe access from the roundabout compared to the more dangerous access that will exist when entering onto the busy and already over used A48.

3) Railway Line

The same conditions apply for the designated housing site which is indicated on the Deposit Plan. In fact sound transmission from the railway is intermittent and also as the speed of the trains have to slow down because of the bend and bridge the sound is probably less than that experienced by the noise of traffic that would be experienced from the busy A48. There exists screening due to trees growing on the bank adjacent to the railway track on the opposite side of the river. If the location for the proposed new housing to the North is suitable and actually butts directly up to the railway track then it begs the question why the "transient" site is not suitable on these grounds?

4) Other Factors

a) The proposed alternative site brings into use land that otherwise has not been allocated for anything.

b) The proposed alternative is located adjacent to existing housing directly across the carriageway.

c) Access to primary and secondary schools are the same as the existing housing estate.

d) There exists grade separated good pedestrian pathways and cycling links under the adjacent carriageway linking to the existing housing estate.

e) Both shops and doctors access are the same as existing housing

f) Good and easy access to potential temporary work opportunities in the docks area

g) Utilities and services readily available

h) I have indicated another site on the other side of the river that does not have any flood risk but is nearer the railway track, access could be modified from the Refuse Tip entrance.

5) Proposed site conditions that potentially have adverse affects on proposed designated employment sites, SSSI and other areas

The proposed alternative site has an extensive and well established plantation of Japanese Knotweed. Because of the well trafficked footpaths past the plantations and in many cases children, possibly from the nearby housing estate, playing and cutting down and using the knotweed there is a increased chance that the knotweed will spread not only north but also south and west onto the employment sites and also into the SSSI which is directly adjacent to this area. The children and youth use the area along the proposed link road and the adjacent fields quite extensively for moto cross trials as well as the area still being used as a general tip area contributing to the contamination of the SSSI. The council owned proposed alternative site will therefore be governed by the "Environmental Protection (Duty of Care) Regulations 1991" which will mean that the council must take action to contain or eradicate the existing knotweed and to prevent it spreading. It is doubtful whether the Environmental Agency will permit the use of chemical herbicides in this area due to the risk to nearby water courses and this is also very expensive. Excavation and disposal provides a much cheaper option which could be carried out during the site preparation works for the "travellers site"

6) Final Comments regarding Deposit Plan site along A48

If the A48 proposal proceeds to planning there will still have to be carried out a comprehensive habitat and environmental assessment as well as highway considerations etc. This will be apart from the "Not in my backyard" protest that the occur and is apparent already. Proposing the development in an area where there is a planning restriction against development will be very difficult. I believe the proposed alternative location provides a WIN WIN case. Both the EA and the CCW would have no reason to object to the proposals and for the reasons I have indicated above will probably support the alternative site use. However it will not be possible to please everyone and I would imagine that the people in the housing estate across the other side of the dual carriageway will probably not like the proposed alternative site. But in this respect the fact that the housing estate is adjacent to the local municipal park (Tredegar Park) they will be more familiar and have firsthand knowledge of the consequences of not providing "proper" sites for the Gypsies and Travellers. On numerous occasions the park has been occupied by an invasion of travelers much to the annoyance of local people. A proper managed site is much preferable and even better if the warden's job description includes a requirement for a "locally based person"

I trust my comments have been constructive. Do I need to submit my comments more formally in a letter or will this email suffice?

With regard to the allocated Employment Zones and the detrimental effect present policies have on prospective manufacturers I will read the Atkins SAR again when I have time later this week. However from what I have read already they (Atkins) have already pointed out deficiencies. Before I embark on writing to you on suggesting how these deficiencies in the Deposit Plan can be overcome can you

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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confirm if there is already action underway regarding their comments as I am extremely busy preparing a report to influence proposed changes in the new Welsh building regulations.

Kind Regards

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Neither
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	Neither
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3152.D1//SP05	Davies, J		12/06/2012	<input type="checkbox"/>	E	O	M
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Document: Deposit Plan, p.18

Site: 363/ Bishton Village

Boundary
Change

Policy: SP05

Summary: Objection to the village boundary of Bishton (Site A).

Item Question *Representation Text*

14	14	Representation
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Regarding objections to the LDP you so kindly explained to us at our recent public meeting.

BCC do not agree with the population per household you displayed. This has been presented and disputed 3 times now but feasible figures to back up the below average population have not been displayed, therefore we dispute the figures presented.

I have attached a street map where BCC are concerned there are anomalies regarding the village boundary plan. These are red outlined ABC. Similar proposals have been presented to you before. NCC promised that the Community Councils would be involved on site determining the Village Boundaries, and we have all only recently signed the peoples charter to this effect. Alas it appears we have been ignored again. BCC strongly object to the boundaries you have proposed. Why should one resident be segregated against for living 100meters from the next resident if their property may be the oldest in the Village? It does not make common sense. There are residents children and grand children who want to settle in the villages and cannot because sensible infill planning is not being accepted as it is in the rest of Wales. We can provide examples if needed. Please consider this a formal objection to the Village Boundaries.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Neither
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	Neither
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3152.D2//SP05	Davies, J			12/06/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.18		Site: 364/ Bishton Village			Boundary Change					
Policy: SP05										
Summary: Amend settlement boundary at Bishton (Site B).										

Item Question Representation Text

14 14 Representation

Regarding objections to the LDP you so kindly explained to us at our recent public meeting.

BCC do not agree with the population per household you displayed. This has been presented and disputed 3 times now but feasible figures to back up the below average population have not been displayed, therefore we dispute the figures presented.

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Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3152.D3//SP05	Davies, J			12/06/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.18		Site: 365/ Bishton Village			Boundary Change					
Policy: SP05										
Summary: Amend settlement boundary at Bishton (Site C).										

Item Question Representation Text

14 14 Representation

Regarding objections to the LDP you so kindly explained to us at our recent public meeting.

BCC do not agree with the population per household you displayed. This has been presented and disputed 3 times now but feasible figures to back up the below average population have not been displayed, therefore we dispute the figures presented.

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Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3153.D11/H15	Boschen, H & J			04/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15

Summary: Objection to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

I object to the proposed use of Allocations H15, H16 and H17 (Newport LDP) for gypsy/traveller sites for the following reasons :- A Health and well being of gypsy/ travellers living on the site may be affected by:- 1.Close proximity of pylons 2. Traffic noise and pollution- road safety for children. The road is busy, much of the traffic using it is heavy - articulated lorries, tractors, oil tankers etc. It appears to go between two of the sites thus increasing the risk of accident caused by/ to straying animals or thoughtless individuals (esp children) 3 . There is neither mains drainage nor gas available in the area. 4. Two of the sites are in or very near the projected expansion route for the M4 - if this is developed the families would - again- be forced to move. B Equality and fairness The proposed sites are outside the settlement lines - as I understand it development by private individuals is not allowed. Granting of special permission to allow development for such a site is not fair to local residents, particularly those who have applied for permission to develop and been refused - and will not be conducive to development of good relationship between communities. C Local history/ natural history/ bird sanctuary/ wildlife Although the proposed developments are individually quite small, the effect of three small developments could be quite disastrous for local wildlife (remembering that the area is an area of SSI and the home of badgers, otters, water voles and greater crested newts - all protected species.) Although the temporary travellers' site on Queensway Meadows appears quite well managed and tidy it has attracted two different satellite sites resulting in unsightly mess, destruction and damage. What steps would be taken to ensure that this did not happen? D Danger of flooding Living on a flood plain we have become increasingly aware of the danger of flooding and recently have had telephone warnings about potential flooding. It seems unfair to potential occupiers to deliberately choose to put a site for single storey dwellings in such a place. I understand that there is a set of recommendations/guidelines prepared by the Welsh Assembly regarding the sites for gypsy/travellers. I also understand that the Allocations cited in my introductory sentence do not meet these recommendations/guidelines. I urge you - in the interest of openness and fairness to all, to review the evidence and find the best place for the gypsy/ traveller sites . Please advise me of open meetings when this matter will be discussed.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3153.D2//H16	Boschen, H & J			04/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 407/ Yew Tree Cottage

Delete Site

Policy: H16

Summary: Objection to H15, H16 and H17

Item	Question	Representation Text	Soundness Test
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14	14	Representation	
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I object to the proposed use of Allocations H15, H16 and H17 (Newport LDP) for gypsy/traveller sites for the following reasons :- A Health and well being of gypsy/ travellers living on the site may be affected by:- 1.Close proximity of pylons 2. Traffic noise and pollution- road safety for children. The road is busy, much of the traffic using it is heavy - articulated lorries, tractors, oil tankers etc. It appears to go between two of the sites thus increasing the risk of accident caused by/ to straying animals or thoughtless individuals (esp children) 3 . There is neither mains drainage nor gas available in the area. 4. Two of the sites are in or very near the projected expansion route for the M4 - if this is developed the families would - again- be forced to move. B Equality and fairness The proposed sites are outside the settlement lines - as I understand it development by private individuals is not allowed. Granting of special permission to allow development for such a site is not fair to local residents, particularly those who have applied for permission to develop and been refused - and will not be conducive to development of good relationship between communities. C Local history/ natural history/ bird sanctuary/ wildlife Although the proposed developments are individually quite small, the effect of three small developments could be quite disastrous for local wildlife (remembering that the area is an area of SSI and the home of badgers, otters, water voles and greater crested newts - all protected species.) Although the temporary travellers' site on Queensway Meadows appears quite well managed and tidy it has attracted two different satellite sites resulting in unsightly mess, destruction and damage. What steps would be taken to ensure that this did not happen? D Danger of flooding Living on a flood plain we have become increasingly aware of the danger of flooding and recently have had telephone warnings about potential flooding. It seems unfair to potential occupiers to deliberately choose to put a site for single storey dwellings in such a place. I understand that there is a set of recommendations/guidelines prepared by the Welsh Assembly regarding the sites for gypsy/travellers. I also understand that the Allocations cited in my introductory sentence do not meet these recommendations/guidelines. I urge you - in the interest of openness and fairness to all, to review the evidence and find the best place for the gypsy/ traveller sites . Please advise me of open meetings when this matter will be discussed.

15	15	Do you want to speak at Public Examination?	
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Neither

Item	Question	Soundness Test	Soundness Test
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1	1	I think the LDP is sound.	
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Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3153.D3//H17	Boschen, H & J			04/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to Policy H15, H16 and H17

Item Question Representation Text

14 14 Representation

I object to the proposed use of Allocations H15, H16 and H17 (Newport LDP) for gypsy/traveller sites for the following reasons :- A Health and well being of gypsy/ travellers living on the site may be affected by:- 1.Close proximity of pylons 2. Traffic noise and pollution- road safety for children. The road is busy, much of the traffic using it is heavy - articulated lorries, tractors, oil tankers etc. It appears to go between two of the sites thus increasing the risk of accident caused by/ to straying animals or thoughtless individuals (esp children) 3 . There is neither mains drainage nor gas available in the area. 4. Two of the sites are in or very near the projected expansion route for the M4 - if this is developed the families would - again- be forced to move. B Equality and fairness The proposed sites are outside the settlement lines - as I understand it development by private individuals is not allowed. Granting of special permission to allow development for such a site is not fair to local residents, particularly those who have applied for permission to develop and been refused - and will not be conducive to development of good relationship between communities. C Local history/ natural history/ bird sanctuary/ wildlife Although the proposed developments are individually quite small, the effect of three small developments could be quite disastrous for local wildlife (remembering that the area is an area of SSI and the home of badgers, otters, water voles and greater crested newts - all protected species.) Although the temporary travellers' site on Queensway Meadows appears quite well managed and tidy it has attracted two different satellite sites resulting in unsightly mess, destruction and damage. What steps would be taken to ensure that this did not happen? D Danger of flooding Living on a flood plain we have become increasingly aware of the danger of flooding and recently have had telephone warnings about potential flooding. It seems unfair to potential occupiers to deliberately choose to put a site for single storey dwellings in such a place. I understand that there is a set of recommendations/guidelines prepared by the Welsh Assembly regarding the sites for gypsy/travellers. I also understand that the Allocations cited in my introductory sentence do not meet these recommendations/guidelines. I urge you - in the interest of openness and fairness to all, to review the evidence and find the best place for the gypsy/ traveller sites . Please advise me of open meetings when this matter will be discussed.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3155.D1//H15.02	Jones, M			04/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.71

Policy: H15.02

Summary: Objection to Policy H15, H16 and H17

Item Question Representation Text

14 14 Representation

As a small haulage business I fear thefts of diesel fuel from our vehicles and extra security costs which could make the business unsustainable.

Disregard for the environment as can be seen where gypsies have camped previously around Queensway Meadows and Leeway not to mention the LG site at Coedkernew.

Higher insurance costs for local properties.

Value of properties declining.

Loose dogs not property secured worrying farmers animals especially pregnant sheep and baby lambs.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3155.D2//H16.02	Jones, M			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

[Delete Site](#)

Policy: H16.02

Summary: Objection to Policy H15, H16 and H17

Item Question Representation Text

14 14 Representation

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Value of properties declining.

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15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3155.D3//H17	Jones, M			04/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to Policy H15, H16 and H17

Item Question Representation Text

14 14 Representation

As a small haulage business I fear thefts of diesel fuel from our vehicles and extra security costs which could make the business unsustainable.

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Value of properties declining.

Loose dogs not property secured worrying farmers animals especially pregnant sheep and baby lambs.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3155.D4//H16.03	Jones, M			24/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Delete site H16 (iii) from deposit LDP

Item Question Representation Text

14 14 Representation

As a small haulage business I fear thefts of diesel fuel from our vehicles and extra security costs which could make the business unsustainable.

Disregard for the environment as can be seen where gypsies have camped previously around Queensway Meadows and Leeway not to mention the LG site at Coedkernew.

Higher insurance costs for local properties.

Value of properties declining.

Loose dogs not property secured worrying farmers animals especially pregnant sheep and baby lambs.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3156.D1//H15.02	Pendragon Plc			24/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to the proposed Gypsy and Traveller site at Queensway Meadows

Item	Question	Representation Text
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2	2	Policy Number H15
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3	3	Paragraph or section number(s) (ii) Queensway Meadows
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11	11	Site Name Queensway Meadows
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14	14	Representation Please see attached document
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We strongly object to the proposed Gypsy and Traveller Transit Accommodation at Queensway Meadows in Newport – Policy H15 (ii) – and request that it should be deleted as a potential site. Our Stratstone Land Rover dealership is located in the near vicinity of the site and our concerns extend to the extra pressure on service in the area and also the road network, traffic flow and road safety.

We are aware of a considerable number of businesses in the area that are concerned about this given that the proposed site sits in one of Newport's primary commercial investment areas. It is not residential area and we therefore do not think it is appropriate location. On that basis, we believe the Deposit Plan fails on 'test of soundness' CE2. Whilst we understand the need for Traveller sites in the form of residential sites or transit sites the site at Queensway Meadows is not suitable for this use and will have a damaging effect on local business.

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness CE2
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Item	Question	Tick-box reply
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3157.D1//CF02	Johnsey Estates Ltd	RPS Group PLC			<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.100

Policy: CF02

Summary: Policy CF2 to be deleted or at the very least the area identified under Policy CF2 should be reduced to cover only the cinema.

Item Question Representation Text

2 2 Policy Number

CF2

4 4 The Proposals Map

East

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

This representation is made on behalf of Johnsey Estates Ltd, the owners of land at Newport Retail Park. Their land ownership is almost coincidental with the land identified on the LDP Proposals Map (East) as being covered by Policy CF2.

1.2 Our clients object to the allocation for the reasons set out below. Representations are also being made separately in respect of Policies R5 - R7.

2 Background

2.1 Policy CF2 states:

"Leisure and sports facilities including outdoor stadia will be safeguarded. Any development which would result in the loss of all or part of the principal use of the site for other uses will not be permitted".

2.2 This policy was not included in the Newport UDP.

2.3 The text at paragraph 9.12 provides no justification or clarification of the policy. It would appear that Newport Retail Park is the only specific allocation under Policy CF2 and that it is otherwise a generic policy.

2.4 Although it is labelled as applying to "sub regional sport and leisure facilities", as worded, it would apply to any type or scale of leisure use within or outside a centre.

2.5 Commercial leisure is considered separately in Policy CF11, where it is considered in the context of being a "town centre" use. r 3 The CF2 Allocation at Newport Retail Park

3.1 The land identified at Newport Retail Park as being covered by Policy CF2 includes the following land uses:

- Cineworld cinema
- Former Megabowl unit (vacant since 2005 and approved for retail redevelopment)
- A number of restaurants (McDonalds, Frankie and Bennys, Pizza Hut)
- Several small shops (Blockbuster block)

3.2 Therefore the only active 'leisure' use within the allocation is the Cineworld cinema and this is a commercial leisure operation. The Megabowl unit was used as a 10-pin bowling alley until 2005 but it has now been vacant for 7 years because of a total absence of demand. Consent has been granted for its redevelopment for retail purposes. Those retail consents remain Newport Retail Park 1 RPS Planning & Development Policy CF2 extant and it is proposed to undertake retail development on this site. The other units on the site have no history of leisure use.

3.3 The site as a whole is considered to lie within the Newport Retail Park District Centre, a position previously acknowledged by the Council and by the Inspector on the appeal approving retail development on the Megabowl site. Separate representations are made in respect of this issue.

4 Conclusions

(1) Policy CF2 is a generic policy which, as drafted, would apply to any scale, type or location of leisure development. It would cover uses in central or out-of-centre locations and also commercial leisure uses. There appears to be no justification for this blanket coverage. Furthermore there is no flexibility whatsoever in the policy as it restricts the loss of even part of the use with no criteria-based evaluation for assessing exceptions. In our view the policy is wholly unjustified in the context of national planning guidance as outlined in Planning Policy Wales.

(2) The policy is labelled as seeking to protect "sub-regional sport and leisure facilities" and yet there is only one specific allocation under the terms of Policy CF2 and that is at Newport Retail Park. This area contains only one major commercial leisure use - the Cineworld multi-screen cinema. We would question whether this cinema is a sub-regional facility but more importantly as a commercial entertainment facility we consider that the policy should not really be applicable.

(3) As a generic policy there is no justification for a specific allocation at Newport Retail Park and in our view it should be deleted. However at the very least the area identified under Policy CF2 should be reduced to cover only the multi-screen cinema.

Newport

15 15 Do you want to speak at Public Examination?

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
	1. The deletion of the CF2 allocation at Newport Retail Park.									
	2. The blanket application and inflexibility of the policy.									
	The issues are interrelated with the client's representations on Policies R5-R7 and warrant debate.									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
13 13	Test of Soundness									
	C2,CE1, CE2, CE4									

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3157.D2//R6	Johnsey Estates Ltd	RPS Group PLC		10/07/2012	<input type="checkbox"/>	P	O		M	

Document:Deposit Plan, p.92

Policy: R6

Summary: Newport Retail Park should be included in the list of District Centres listed in Policy R5.

Item Question *Representation Text*

2 2 Policy Number
R5

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

1 Introduction

1.1 This representation is made on behalf of Johnsey Estates Ltd, the owners of land at Newport Retail Park. Johnsey Estates developed Newport Retail Park as a whole within the areas shown in red on Plan JCC7013/07 at Appendix 1. The company retain ownership of the land edged blue on the plan.

1.2 Representations are made within this statement on policies R5-R7 and on Inset Plan 25. Separate representations have been made in respect of Policy CF2.

2 The Boundaries of the District Centre (Inset Plan 25)

2.1 The Inspector who considered representations on the Newport UDP concluded that Newport Retail Park should be designated as a district centre serving the eastern side of Newport, acknowledging its role at the time and taking account of the requirement of the Eastern Expansion Area, involving 4,000 new homes. [His findings are set out in Appendix 2].

2.2 Although the Council accepted the recommendations of the UDP Inspector and included Newport Retail Park as a district centre it failed to specifically identify a boundary for the centre. However, the issue as to whether the Johnsey retained land fell within the defined district centre has been subsequently considered on a number of occasions.

2.3 In 2008 there was a planning appeal relating to the former Megabowl unit. In the Statement of Common Ground on the appeal the Council agreed that if there had been a defined district centre boundary the Megabowl unit would have fallen within it. The Inspector agreed and m allowed retail consent. His decision letter is attached at Appendix 3.

2.4 In September 2010, planning permission was granted by the Council for the alteration of the former Megabowl unit to provide a large new foodstore of just over 5,000 square metre gross. 0m It was clearly accepted in the Officers Report that the site was within the district centre. The i consent is attached at Appendix 4.

2.5 The District Centre Background Paper (April 2012) contains a plan (Plan 16.1) which outlines the existing uses in Newport Retail Park District Centre. Plan 16.2 then defines a district centre boundary that includes only the Tesco store and Stadium Developments section of the site. It

- appears to be based on being a 'core' rather than the district centre as a whole. The defined to district centre excludes the following elements:

- Megabowl (A site which has consent for retail development which is included in the Colliers Retail Study as a retail commitment and which will be redeveloped for retail *» purposes)
- The Blockbuster retail block (A1)
- McDonalds (A3)
- Frankie and Bennys (A3)
- Pizza Hut (A3)

Newport Retail Park 1 RPS Planning & Development

Policy R5 - R7 & Inset 25

- Cineworld cinema (D2)
- Matalan (A1)
- Land south of Matalan (Approved for A1)
- Car showrooms

2.6 With the exception of the car showrooms all of the uses are 'town centre uses' within the context of national planning policy. PPW states at paragraph 10.2.4:

"Although retailing should continue to underpin town, district, local and village centres it is only one of the factors which contribute towards their well-being. Policies should encourage a diversity of uses in centres. Mixed use developments, for example combining retailing with entertainment, restaurants and housing, should be encouraged so as to promote lively centres as well as to reduce the need to travel to visit a range of facilities. Leisure uses can benefit town and district centres and with adequate attention to safeguarding amenities can contribute to a successful evening economy."

2.7 It therefore seems entirely artificial to exclude large elements of town centre uses from the district centre boundary. Apart from being irrational in general terms the exclusion of the area closest to the Eastern Expansion Area seems inconsistent with the objective of achieving closer integration between the two.

2.8 In our opinion the district centre boundary shown on Inset 25 should include all of the area within the red line on the plan in Appendix 1. However, at the very least it should include the jnt blue land

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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which entirely comprises town centre uses and is an integral part of the district centre.

2.9 We can see no justification for defining a retail core in this case but if this is the intended objective then it should not be confused with the definition of the district centre itself.

3 Policies R5 - R7

3.1 Policy R5 sets out a criteria based policy for the consideration of new retail proposals within district centres. Criterion (i) requires development to be of a scale appropriate to the particular centre and criterion (ii) requires that the proposal should not have an adverse impact on the vitality and viability of the City Centre.

3.2 It is contended that these tests would provide sufficient control over any new development proposals at Newport Retail Park and that Policy R5 should be amended to include Newport Retail Park District Centre within the list of district centres set out in this policy.

3.3 Policies R6 and R7 are assumed to be read together. Policy R6 sets out a blanket restriction on any new retail sales floorspace within the defined district centre. Policy R7 sets out a range of criteria which it is presumed is meant to apply to situations where there is no increase in retail floorspace involved in a proposal.

3.4 There is, in our view, no justification for a total embargo on all new retail floorspace in Newport Retail Park District Centre as proposed in Policy R6. The appropriate test for any new floorspace proposal or any changes requiring planning permission is the impact on the City

Newport Retail Park 2 RPS Planning & Development

Policy R5 - R7 & Inset 25

Centre. This is already contained in criterion (ii) of Policy R5. The third criterion in Policy R7 is in effect the same test and does not warrant different consideration.

3.5 Criteria (v)-(vii) of Policy R7 are in effect standard development control considerations which would apply to any almost development in any location and it is considered unnecessary to provide specific reference to them.

3.6 Criterion (iv) seeks to "improve links to the adjoining residential development". However, at present the proposed district centre boundary does not "adjoin" the residential development in the Eastern Expansion Area.

3.7 Criteria (i) and (ii) have no justification whatsoever. While the Colliers Study concluded that there is no quantitative need for additional convenience goods floorspace in the City as a whole that does not justify restricting new entrants to the convenience market within a district centre. At one stage there were 4 convenience retailers on Newport Retail Park: Tesco, Iceland, Kwik Save and Lidl, now there are only 3 remaining.

3.8 Paragraph 10.3.2 of PPW states:

"This approach reinforces the role of centres as the best location for most retail/leisure activities. In contrast to the way in which locations outside existing centres are dealt with, consideration of the need for additional provision is not a matter that should be taken into account when proposals for uses best located in centres come forward. It is not the role of the planning system to restrict competition between retailers within centres."

3.9 With 4,000 new homes being built on the Eastern Expansion Area and only a very small proportion already completed there is no justification for limiting competition in the convenience goods sector within a district centre. Criterion (i) is therefore wholly inconsistent with Government policy.

3.10 In terms of Criterion (ii) and the proposed restriction on unit size to a minimum of 500 square metres we would suggest that this is illogical within a district centre, where you would expect small units to be located.

3.11 Overall we consider that there is no justification for either Policy R6 or R7 and the matter can be adequately controlled by way of a minor change to Policy R5.

4 Conclusions

4.1 In summary Johnsey Estates seek the following changes to the retail policies on the LDP:

1. The amendment of the district centre boundary shown on Inset 25 to extend to the inclusion of at least the blue land on the plan at Appendix 1.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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2. The amendment of Policy R5 to include Newport Retail Park District Centre in the list of defined district centres.

3. The deletion of policies R6 and R7.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?							Yes	
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Our clients wish to speak in relation to all of the points on Policies R5-R7 (and CF2).

The LDP proposals run counter to the findings of the UDP Inspector, Inspectors on appeal cases and also the Council's own previous position. The issues need to be debated.

Item Question *Soundness Test*

1	1	I think the LDP is sound.							No	
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13	13	Test of Soundness								
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C2, CE1, CE2, CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3157.D3//R6	Johnsey Estates Ltd	RPS Group PLC		10/07/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.92

Policy: R6

Summary: Policy R6 should be deleted.

Item Question *Representation Text*

2 2 Policy Number
R6

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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1 Introduction

1.1 This representation is made on behalf of Johnsey Estates Ltd, the owners of land at Newport Retail Park. Johnsey Estates developed Newport Retail Park as a whole within the areas shown in red on Plan JCC7013/07 at Appendix 1. The company retain ownership of the land edged blue on the plan.

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Newport Retail Park 1 RPS Planning & Development

Policy R5 - R7 & Inset 25

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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Newport Retail Park 2 RPS Planning & Development

Policy R5 - R7 & Inset 25

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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3. The deletion of policies R6 and R7.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C2, CE1, CE2, CE4	
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3157.D4//R7	Johnsey Estates Ltd	RPS Group PLC		10/07/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.92

Policy: R7

Summary: There is no justification for Policy R7 and it should be deleted and absorbed in Policy R5

Item Question *Representation Text*

2 2 Policy Number

R7

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Newport Retail Park 1 RPS Planning & Development

Policy R5 - R7 & Inset 25

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Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Additional Information Submitted - Available on Request

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Yes							
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<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness									
	C2, CE1, CE2, CE4									

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3157.D5//R5	Johnsey Estates Ltd	RPS Group PLC		10/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.91

Site: 360/ Newport Retail Park

Boundary
Change

Policy: R5

Summary: The district centre boundary should be amended to include additional land within Newport Retail Park as shown on the plan in Appendix 1.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Yes</i>
5	5	Inset Plan(s)	Yes
	25		

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>
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1 1 I think the LDP is sound.

No

13 13 Test of Soundness

C2, CE1, CE2, CE4

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3159.D1//H15.01 C	Roughley, Mr Brian			24/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.71

Site: 428/ Pound Hill

Delete Site

Policy: H15.01 Coedknernew

Issue: Infrastructure

Summary: Objection to proposed Gypsy and Traveller sites due to apparent non-compliance with consistency tests

Item Question Representation Text

2 2 Policy Number

Newport Local Development Plan 2011-2026 (Deposit Plan April 2012)

3 3 Paragraph or section number(s)

Housing Section 5 / H15 - Gypsy and Traveller Transit Accommodation

11 11 Site Name

Coedknernew, Pound Hill

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
14	14	Representation								
<p>Objection and Proposal :- I would like to raise an objection to the siting of the Gypsy & Traveller Transit Site proposed for Coedkernew, Pound Hill. I believe the Pound Hill site is unsuitable for development, in particular for human habitation, and the proposal should be deleted from the LDP. Tests of Soundness :- Since I do not know the precise details of each test, it is difficult for me to establish if all ten tests of soundness are acceptable with regard to the proposed Pound Hill site. However, from the titles of the tests, it would appear to me that the proposal is non-compliant with Consistency Tests C1, C4 and Coherence & Effectiveness Test CE2. Reasons for Objection :- 1. Green Wedge Area : From the development plan maps, the proposed site would appear to be designated as an area of countryside, possibly within a special landscape area, and definitely located within the confines of the designated green-wedge region to the east of Castleton and Marshfield. I understand that it is the policy of the NCC to maintain the integrity of the green-belt and green-wedge areas. The site is being proposed as a rural exception site. The proposal would therefore appear to be in direct conflict with this well-intentioned and established policy. 2. Safety : The proposed site is likely to require considerable remediation and expense to reconfigure the road structure in an attempt to make it a safe access point onto the adjacent busy A48. Access of vehicles from a minor side road onto the A48 is treacherous at the best of times, and I know from personal experience how dangerous this can be, having witnessed a plethora of near-miss vehicular incidents that would have remained unreported on local statistical databases. I believe that the additional traffic (an inevitable consequence of the proposal) would exacerbate an already dangerous situation, especially since in general, the group of people in question are frequently known for ignoring many of the rules and safeguards that most of us adhere to and accept as being sensible precautions. 3. Detrimental to Personal Health : The proposed site is a long narrow strip of land that is sandwiched between two very busy road structures (M4 and A48). The incessant drone of traffic in addition to the possible elevated concentration fumes arising from car exhaust from the immediate north and south boundaries, would in my opinion, make this area unsuitable for human habitation. It is of interest that this area has not previously been developed for the establishment of residential properties. Perhaps developers have realised that it would be very difficult to sell homes in this undesirable location. Why then should it be considered acceptable to force the Gypsy/Traveller transit population onto such an inappropriate site? What sort of message does this proposal by the NCC appear to send? We wouldnt want our families living in this environment, but its quite adequate for the likes of you. 4. Lack of Local Facilities : The villages of Castleton and Marshfield are notably devoid of many local facilities that may be expected as standard within an area that has previously be the subject of high residential expansion. The corresponding provision of significantly improved local facilities is sadly lacking. This includes the lack of easy access to general shops, a pharmacy and a viable GP surgery. The local village school is filled to capacity, yet I understand it will be expected to accept new intake from the Gypsy/Traveller community. In addition, the school is about one mile away from the G/T-site, requiring the G/T-children to cross the main A48 road during peak times of traffic. Although a footbridge is available as a crossing point, it is more likely that unaccompanied children, as well as parents with children, will probably take the more direct route and take a chance crossing the busy road between the Pound Hill site and Marshfield Road. The local police station that used to be sited just off the A48 (very near to Pound Hill) has now been removed, necessitating the locality to be policed from the Pill station. Bearing in mind the notoriety of the Pill area of Newport and the general lack of policing resources, any issues arising from the presence of the G/T community are likely to take second place to other higher priority concerns. Perhaps the only plus point from the G/T view point is that the village is served by three public houses which may well appeal to the G/T community the Coach & Horses in particular may see an initial increase in trade, but with subsequent possible loss of established local trade. 5. Public Meeting : A local public meeting, which was well attended by local residents, was held in Castleton on 14 May 2012 to discuss the LDP. Although this was a meeting arranged to review all aspects of the development plan, by far the majority of points raised concerned the proposed G/T-site at Pound Hill, showing the depth of feeling within the local community over this issue. I cannot recall a single voice that was raised in favour of the Pound Hill G/T-site proposal. I think it is fair to say that the local community is predominately and stridently against the proposal, and many residents have grave concerns how such a group would fit in with the existing community. The impact of a G/T-site on the value of local property prices and detriments to the perceived attractiveness of the area to potential home buyers is also of great concern to many people.</p>										
15	15	Do you want to speak at Public Examination?							No	
<p><i>Item Question</i> <i>Soundness Test</i></p>										
1	1	I think the LDP is sound.							No	
13	13	Test of Soundness C1, C2, CE2								
<p><i>Item Question</i> <i>Tick-box reply</i></p>										
10	10	Delete an existing site.							Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3160.D1//R5	Stadium Newport Limited	Addleshaw Goddard LLP		04/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.91

Policy: R5

Summary: Seeking to add Newport Retail Park District Centre to the list of defined district centres

Item Question Representation Text

2 2 Policy Number
Policies R5 - R7 and the LDP Evidence Base

14 14 Representation
See hyperlink for detailed response.

Add 'Newport Retail Park District Centre' to the list of defined district centres. If considered necessary, add NRPDC specific criterion (iv) from Policy R&, and add general criteria (vi) - (vii) from Policy R7.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Policies R5, R6 and R7

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
C2, CE1, CE2, CE4

Item Question

Tick-box reply

6 6 A new policy Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3160.D2//R6	Stadium Newport Limited	Addleshaw Goddard LLP		04/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.92

Policy: R6

Summary: Seeking to delete most of Policy R6

Item Question Representation Text

2 2 Policy Number
Draft Policies R5 - R7 and the LDP evidence base

14 14 Representation
See hyperlink for detailed response:
c
Policies R6 and R7 and supporting text - delete in entirety, save for paragraphs 8.21 and 8.22 which should be added to the supporting text of Policy R5.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Policies R5, R6 and R7

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
C2, CE1, CE2 and CE4

Item Question Tick-box reply

6 6 A new policy

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3160.D3//R7	Stadium Newport Limited	Addleshaw Goddard LLP		04/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.92

Policy: R7

Summary: Seeking to delete most of policy R7

Item Question Representation Text

2 2 Policy Number
Draft Policies R5 - R7 and the LDP Evidence Base.

14 14 Representation
See hyperlink for detailed response:

Policies R6 and R7 and supporting text - delete in entirety, save for paragraphs 8.21 and 8.22 which should be added to the supporting text of Policy R5.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Policies R5, R6 and R7.

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
C2, CE1, CE2, and CE4

Item Question

Tick-box reply

6 6 A new policy Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3161.D11/Objectiv	Green Party			24/05/2012	<input type="checkbox"/>	W	O		M	

Document:Deposit Plan, p.9

Policy: Objective 2

Summary: Objection to the Climate Change Objective including recommendation for stricter instructions on the build requirements

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number Objective 2 - Climate Change	
3	3	Paragraph or section number(s) Sustainable Housing	
7	7	A new paragraph or new text.	Yes
14	14	Representation Sustainable housing requirements should include precise instructions to build south facing rooflines for solar panels and south facing windows to take advantage of thermal gain from the sun. I would also expect to see more emphasis on continuously updating the most up to date building standards including triple glazing. Also I find no provision for grey water harvesting, or any other kind of water harvesting within new build recommendations for sustainability. More emphasis should be put on retro-insulating older properties particularly rented properties. Commercial property should be subject to stringent tests with regards to heat loss, resource use and and energy consumption.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3161.D2//Objectiv	Green Party			24/05/2012	<input type="checkbox"/>	W	O		M	

Document:Deposit Plan, p.10

Policy: Objective 4

Summary: Objection to the Objective 4 in relation to housing and the need to include provision for home working

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
2	2	Policy Number Housing - Objective 4	
7	7	A new paragraph or new text.	Yes
14	14	Representation Include provision for home/office within new build plans which solves travel to work, traffic congestion, pollution and micro business difficulties, whilst encouraging new business starts and fledgling entrepreneurs and helping single parents into work which does not compromise family units.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3161.D3/11.2 & 11.	Green Party				<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.113, para.11.2 & 11.6

Policy: W1

Summary: Objection to the Policy regarding Waste highlighting the need to reflect future trends not past behaviours

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number 11 Waste		
3	3	Paragraph or section number(s) 11.2 ans 11.6		
7	7	A new paragraph or new text.		Yes
14	14	Representation It may be a mistake to mention Prosiect Gwyrdd specifically in the LDP as at the time of writing the technology has been chosen, and it is incineration. There is overcapacity for incineration across the EU with large incinerators currently closing. There is also incineration plant overcapacity in GB of 4.7 million tonnes (14%)not accounting for further falls in residual waste as recycling rates increase. As a result Prosiect Gwyrdd may not be the mechanism for selection of waste disposal facilities in Newport Furthermore, waste is now being seen as a valuable resource and future trends will depend more heavily on recovery to reflect the economic benefits of reducing imports. Waste provision should reflect future trends, not past behaviours.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
6	6	A new policy		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3162.D1//R1	Queensberry Real Estate	G L Hearn Limited		04/07/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.88

Site: 337/ Friars Walk

New Site

Policy: R1

Map: Inset 26: Newport City Centre

Summary: Newport City Centre insert plan should be updated to include the redevelopment scheme for John Frost Square/Friars Walk

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
5	5	Inset Plan(s) Newport City Centre	Yes
7	7	A new paragraph or new text.	Yes
14	14	Representation It is considered that the Newport City Centre insert plan should be updated to reflect the existing planning permission (March 2012) pertaining to the redevelopment scheme for John Frost Square/Friars Walk. A clear and cohesive strategy is required within the plan for the City Centre/Retail development and the site should be identified as an existing retail/leisure commitment reflecting the extant consent and designated as appropriate for class A1/A3/D1 use. Additional Information Submitted - Available on Request	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Amendment to the inset map. The City Centre redevelopment site is one of Newport's most significant development schemes. It is important that this strategy of the Local Development Plan reflects this.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1, CE2	
8	8	Add a new site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3162.D2/8.4/R1	Queensberry Real Estate	G L Hearn Limited		04/07/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.88, para.8.4

Policy: R1

Summary: Seeking amendments to para 8.4 - to be updated to reflect current position with respect to Friars Walk/City Centre development scheme.

Item Question Representation Text

3 3 Paragraph or section number(s)
8.4

7 7 A new paragraph or new text. Yes

14 14 Representation

Paragraph 8.4 of the Local Development Plan does not reflect the current position in respect of the Friars Walk/City Centre Development Scheme. The text of paragraph 8.4 should be updated as follows:

Planning permission was granted by Newport City Council in March 2012 for a major redevelopment scheme known as Friars Walk. The land has been assembled further to the completion of a compulsory purchased order. The development site will deliver class A1 retail, class A3 and class D1 leisure uses. This and other appropriate schemes to enhance the City Centres retail offer will be supported.

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Amendment to the insert map

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3162.D3//R6	Queensberry Real Estate	G L Hearn Limited		04/07/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.92

Policy: R6

Summary: Support policy R6

Item Question Representation Text

2 2 Policy Number

R6 - Newport Retail Park District Centre

14 14 Representation

The Council's approach with regard to Newport retail Park District Centre is supported. Further Growth of this centre would prejudice the retail hierarchy as set out in strategic policy SP20.

15 15 Do you want to speak at Public Examination?

Yes

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3163.D1//H15.02	Persimmon Homes Wales Ltd	Asbri Planning		04/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to the allocation of land at Queensway Meadows for Gypsy and Traveller transit accommodation

Item	Question	Representation Text	Soundness Test
2	2	Policy Number H15 (ii)	
4	4	The Proposals Map	Yes
11	11	Site Name Queensway Meadows	
12	12	Site Reference H15 (ii)	
14	14	Representation We wish to object to the allocation of land at Queensway Meadows for Gypsy and Traveller Transit Accommodation. The use for residential forms of accommodation, albeit temporary, transit gypsy and traveller caravans is not appropriate as it is close to noise generating uses where there would be likely to be objections from future occupiers, particularly to the distribution uses which may operate during late hours. PPW Paragraph 9.3.2 states that residential development in the vicinity of existing industrial uses should be restricted if residents may object and try to curtail the industrial use. Furthermore there are underused and vacant employment plots to the west and north where future developers will be deterred from talking up land close to such a use. The proposal could therefore prevent much needed employment investment in an area which continues to suffer from the closure of steel making activities. The enclosed covering submission letter also refers. (see hyperlink) Additional Information Submitted - Available on Request	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination To put the case forward for the site's omission and to present the case directly before the Inspector.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness C1, C2, CE2	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy *Representor*

Agent

Accession No *Date Lodged* *Late?* *Source* *Type* *Mode* *Status* *Status Modified*

Item Question

Tick-box reply

10	10	Delete an existing site.
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3163.D2//H16.02	Persimmon Homes Wales Ltd	Asbri Planning		04/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Object to the allocation of land at the former Army Barracks, Pye Corner, Nash for Gypsy and Traveller accommodation.

Item	Question	Representation Text
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2	2	Policy Number H16 (ii)
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4	4	The Proposals Map
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Yes

11	11	Site Name Pye Corner, Nash
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12	12	Site Reference H16 (ii)
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14	14	Representation
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We wish to object to the allocation of land at the former Army Barracks, Pye Corner, Nash for permanent Gypsy and Traveller Accommodation.

The site is adjacent to land covered by employment allocation EM1 (ii) under which there is stringent criteria for accommodating large scale, prestigious employment uses. Nevertheless the location of a gypsy/traveller site at a key location in relation to the overall allocation appears to be acceptable. The presence of a permanent encampment will be perceived in a negative manner and will deter investment.

In this respect the proposals conflict with Deposit Plan Objective 3 – Economic Growth, which seeks to: “enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region.”

The presence of two sets of overhead transmission lines, is also contrary to Objective 9 of the Deposit Plan – Health and Well Being, which seeks to: “provide an environment that encourages healthy and safe lifestyle choices and promotes well being.”

The enclosed covering submission letter elaborates further on the above. (see hyperlink)

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?
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Yes

16	16	Subject to speak on at Examination
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To put the case forward for the site's omission and to present the case directly before the Inspector.

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness C1, C2, CE2
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>			<i>Tick-box reply</i>							
10 10	Delete an existing site.									Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3163.D3//H16.03	Persimmon Homes Wales Ltd	Asbri Planning		04/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Object to the allocation of land at the former Army Camp, Pye Corner, Nash for permanent Gypsy and Traveller accommodation

Item	Question	Representation Text
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2	2	Policy Number H16 (iii)
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4	4	The Proposals Map
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Yes

11	11	Site Name Pye Corner, Nash
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12	12	Site Reference H16 (iii)
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14	14	Representation
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We wish to object to the allocation of land at the former Army Camp, Pye Corner, Nash for permanent Gypsy and Traveller Accommodation.

The site allocation extends into an area of countryside which is covered by a Site of Special Scientific Interest (SSSI) designation, and which is also identified as a Special Landscape Area in the Deposit Plan. It therefore represents an extension of residential development into such a sensitive area.

The site selection process can be questioned in terms of the concentration of three gypsy/traveller sites in close proximity (other pitches are proposed in Coedkernew (transit) and Bettws (permanent). It is, however, noted from the Fordham Needs Assessment and Gypsy and Travellers Background Paper, that all the existing pitches, both authorised and unauthorised, are located on the western side of Newport. Whilst exhaustive surveys have established demand for such accommodation, the allocations do not seem to have reflected demand in locational terms.

Furthermore, whilst employment related development in the area is required to apply stringent measures in terms of flood risk and mitigation for impact on the SSSI, no such concerns are expressed in respect of the gypsy site allocation policies.

The enclosed covering submission letter elaborates further on the above (see hyperlink)

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?
----	----	---

Yes

16	16	Subject to speak on at Examination
----	----	------------------------------------

To put the case forward for the site's omission and to present the case directly before the Inspector.

Item	Question	Soundness Test
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1	1	I think the LDP is sound.
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No

13	13	Test of Soundness C1, C2, CE2
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question</i>		<i>Tick-box reply</i>								
10 10	Delete an existing site.									Yes

3164.D1//H15.02 Reece, Mr and Mrs J 04/07/2012 P O M

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to policies H15, H16 and H17

<i>Item Question</i>	<i>Representation Text</i>	
14 14	Representation Our reasons for objections against Policies H15, H16 and H17 in the Local Development Plan are as follows;	
	1. Welsh Government guidelines say they should not be in a flood plain.	
	2. The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.	
	3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.	
	4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).	
	5. Welsh Government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.	
	6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.	
15 15	Do you want to speak at Public Examination?	Neither

<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3164.D2//H16.02	Reece, Mr and Mrs J			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

[Delete Site](#)

Policy: H16.02

Summary: Objection to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Our reasons for objections against Policies H15, H16 and H17 in the Local Development Plan are as follows;

1. Welsh Government guidelines say they should not be in a flood plain.
2. The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.
3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.
4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).
5. Welsh Government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3164.D3//H17	Reece, Mr and Mrs J			04/07/2012	<input type="checkbox"/>	P	O		M	

Document:Deposit Plan, p.72

Policy: H17

Summary: Objection to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

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1. Welsh Government guidelines say they should not be in a flood plain.
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3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.
4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).
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6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3164.D4//H16.03	Reece, Mr and Mrs J			25/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Delete site H16 (iii) from deposit LDP

Item Question Representation Text

14 14 Representation

Our reasons for objections against Policies H15, H16 and H17 in the Local Development Plan are as follows;

1. Welsh Government guidelines say they should not be in a flood plain.
2. The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.
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5. Welsh Government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3165.D1//H15.02	Lockyear, Mary			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to policies H15, H16 and H17

Item	Question	Representation Text
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14	14	Representation
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Our objection against policies H15, H16, & H17 are;

The two sites at Broadstreet common are in or at the edge of an SSSI area. These two sites are within a rural area and outside the environs of the village, we believe that such developments would have an adverse impact on the rural landscape. There are, as your plans show, deep reens all around the area, surely having these reens would pose a danger to children should the sites be too close to them. I do not think fencing all the reens would be an option?

There are no paths and children would have to walk in the road, this would be a danger to both pedestrians and car/ lorry/ farm vehicles that use the area.

Welsh Development guidelines say that sites should not be in a flood plain.

The Welsh government guidelines also state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the social infrastructure. We believe that one site could contain 40 caravans, this would surely house more than 100 travellers, in our village we have just over 200 people shown on the electoral register so to add that many extra people to the area would have a major effect on the community.

Residents of the area have been refused planning permission for new builds for many years because of the City Council's policy of not allowing development within the flood plain or outside of the environs of the village so how can this just be reversed?

Many parts of this area do not have mains drainage/ sewerage. Those of us that have it had to wait many years and pay for connection to give us the facility. When the weather is bad the land becomes very boggy and I would have thought that this was not suitable for housing caravans.

I have looked online at the plans and the land involved that is being earmarked for these sites is vast. The size suggested on these plans is disturbing.

On the commercial site at Queensway Meadows many of the companies there are also unhappy with the proximity of these proposed sites to their businesses. Newport cannot afford to lose investment from such companies but we are constantly hearing how several of the existing companies are considering moving if these sites go ahead.

I hope you are able to rethink your proposals, there are bound to be more suitable sites and you must be getting suggested areas. We know that this is difficult to deal with, and sites have to be found but to propose 3 sites in such a small rural community is totally wrong.

15	15	Do you want to speak at Public Examination?	Neither
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	Neither
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3165.D2//H16.02	Lockyear, Mary			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objections to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Our objection against policies H15, H16, & H17 are;

The two sites at Broadstreet common are in or at the edge of an SSSI area. These two sites are within a rural area and outside the environs of the village, we believe that such developments would have an adverse impact on the rural landscape. There are, as your plans show, deep reens all around the area, surely having these reens would pose a danger to children should the sites be too close to them. I do not think fencing all the reens would be an option?

There are no paths and children would have to walk in the road, this would be a danger to both pedestrians and car/ lorry/ farm vehicles that use the area.

Welsh Development guidelines say that sites should not be in a flood plain.

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15 15	Do you want to speak at Public Examination?	Neither
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Item Question Soundness Test

1 1	I think the LDP is sound.	Neither
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3165.D3//H17	Lockyear, Mary			04/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Our objection against policies H15, H16, & H17 are;

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15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3165.D4//H16.03	Lockyear, Mary			25/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Delete site H16 (iii) from deposit LDP

Item	Question	Representation Text	Soundness Test
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14	14	Representation	
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Our objection against policies H15, H16, & H17 are;

The two sites at Broadstreet common are in or at the edge of an SSSI area. These two sites are within a rural area and outside the environs of the village, we believe that such developments would have an adverse impact on the rural landscape. There are, as your plans show, deep reens all around the area, surely having these reens would pose a danger to children should the sites be too close to them. I do not think fencing all the reens would be an option?

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15	15	Do you want to speak at Public Examination?	Neither
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Neither

Not Ticked

Item	Question	Soundness Test
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1	1	I think the LDP is sound.	Neither
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Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3182.D1//H15.02	Nash Community Council			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objections to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Re:- Planning H15,H16,H17.

With reference to the LDP meeting held at Nash Village hall on Wednesday 23 May, 2010.

We are pleased that so many residents and business attended and raised very many points, unfortunately, in my opinion none were addressed with any validity.

It is clear that the sites suggested by the previous council are clearly inadequate and furthermore highlights to the residents that the entire project was ill advised and carried out in haste.

We have constantly stated as a community we are not against travellers per sae, however, this area is simply inadequate for their needs.

You will also appreciate that some of my fellow residents and fellow councillors raised some of reasons in great detail, i.e. flood levels, inadequate pavements, inadequate street lighting, inadequate roads, all of which are adequate for the current number of residents, but would certainly not be if more and more traveller families were allowed to take up residence.

Finally, let us not forget the SSSi sites, or the issue when many farmers in the three parishes felt much hardship when their land was compulsory purchased – why now is it correct to give that land over to travellers with little or no regards to the devastating consequences the removal of the land from the farmers caused.

We implore you and your fellow planners to consider the impact any careless decisions could have on this wonderful community.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3182.D2//H16.02	Nash Community Council			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objections to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3182.D3//H17	Nash Community Council			04/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objections to policies H15, H16 and H17

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14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3182.D4/H16.03	Nash Community Council			28/05/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Delete H16 (iii) from deposit LDP

Item Question Representation Text

14 14 Representation

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We implore you and your fellow planners to consider the impact any careless decisions could have on this wonderful community.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3183.D1//H16.02	Webster, Dawn & Paul			04/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to Gypsy/Traveller sites within community of Nash

Item Question Representation Text

14 14 Representation

They are in a flood plain, contrary to Welsh Government guidelines - recent flooding in other parts of the UK has shown that caravans are extremely vulnerable in these conditions.

One of the proposed permanent sites on Broadstreet Common is in an SS I area and the other is on the edge of the SS I area. They are also in an area of archaeological interest.

Development by members of the local community within this rural area has been consistently refused, they being told that any such development outside the council defined boundaries of Nash village would set a precedent. Planning applications have also been refused because it is a flood plain and also would increase the number of vehicles using Broadstreet Common.

The above two sites are within the rural area and would have an adverse effect upon the landscape.

The sites in Broadstreet Common are adjacent to reens which pose a danger of drowning to young children - in recent years an adult we personally knew was drowned in the reen bordering one of these sites.

Nash is a small community with only around 200 electors shown on the Electoral Register for Nash Village – the total population on these sites should not be so large as to dominate the nearest settled community. The three sites may in themselves be small but taken together they have a huge impact on the community. The travellers living in the Broadstreet Common sites will most probably soon outnumber the present residents of Broadstreet Common.

The residents of Broadstreet Common are not connected to main sewerage as it would be too expensive for the Council to provide this for them. Sewerage would have to be provided for the Broadstreet Common sites, would the Council be willing to extend the system to provide main sewerage for all inhabitants of Broadstreet Common?

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3183.D2//H16.03	Webster, Dawn & Paul			04/07/2012	<input type="checkbox"/>	P			M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to Gypsy/Traveller sites in community of Nash

Item Question Representation Text

14 14 Representation

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The above two sites are within the rural area and would have an adverse effect upon the landscape.

The sites in Broadstreet Common are adjacent to reens which pose a danger of drowning to young children - in recent years an adult we personally knew was drowned in the reen bordering one of these sites.

Nash is a small community with only around 200 electors shown on the Electoral Register for Nash Village – the total population on these sites should not be so large as to dominate the nearest settled community. The three sites may in themselves be small but taken together they have a huge impact on the community. The travellers living in the Broadstreet Common sites will most probably soon outnumber the present residents of Broadstreet Common.

The residents of Broadstreet Common are not connected to main sewerage as it would be too expensive for the Council to provide this for them. Sewerage would have to be provided for the Broadstreet Common sites, would the Council be willing to extend the system to provide main sewerage for all inhabitants of Broadstreet Common?

15 15 Do you want to speak at Public Examination? Neither

Item Question Soundness Test

1 1 I think the LDP is sound. Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3183.D3//H15.02	Webster, Dawn & Paul			28/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Delete site H15 (ii) from deposit LDP

Item	Question	Representation Text
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14	14	Representation
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They are in a flood plain, contrary to Welsh Government guidelines - recent flooding in other parts of the UK has shown that caravans are extremely vulnerable in these conditions.

One of the proposed permanent sites on Broadstreet Common is in an SS I area and the other is on the edge of the SS I area. They are also in an area of archaeological interest.

Development by members of the local community within this rural area has been consistently refused, they being told that any such development outside the council defined boundaries of Nash village would set a precedent. Planning applications have also been refused because it is a flood plain and also would increase the number of vehicles using Broadstreet Common.

The above two sites are within the rural area and would have an adverse effect upon the landscape.

The sites in Broadstreet Common are adjacent to reens which pose a danger of drowning to young children - in recent years an adult we personally knew was drowned in the reen bordering one of these sites.

Nash is a small community with only around 200 electors shown on the Electoral Register for Nash Village – the total population on these sites should not be so large as to dominate the nearest settled community. The three sites may in themselves be small but taken together they have a huge impact on the community. The travellers living in the Broadstreet Common sites will most probably soon outnumber the present residents of Broadstreet Common.

The residents of Broadstreet Common are not connected to main sewerage as it would be too expensive for the Council to provide this for them. Sewerage would have to be provided for the Broadstreet Common sites, would the Council be willing to extend the system to provide main sewerage for all inhabitants of Broadstreet Common?

15	15	Do you want to speak at Public Examination?	Neither
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Not Ticked

Item	Question	Soundness Test
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1	1	I think the LDP is sound.	Neither
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Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3186.D1//H16.02	Nurden, Ms Jan			28/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Issue: Infrastructure

Summary: Objection against the proposed Gypsy and Traveller sites

Item Question Representation Text

2 2 Policy Number

H15, H16, H17

3 3 Paragraph or section number(s)

Section 5 - Housing

5 5 Inset Plan(s)

Yes

GYPSY & TRAVELLERS TRANSIT, RESIDENTIAL AND PROPOSED SITES

12 12 Site Reference

H15, H16, H17

14 14 Representation

We wish to lodge a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash Our reasons for objection against Policies H15, H16 & H17 in the Local Development Plan are as follows; 1.Welsh Government guidelines say they should not be in a flood plain . 2.The two sites on Bradstreet Common are in the middle of a SSSI area or on the edge of one. 3.The two sites on Broadstreet Common are within the rural area and outside the environs of the village , such developments would have an adverse impact on the rural landscape. 4.The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites) 5.Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village . 6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within the flood plain or outside the environs of the village, and that there is no mains sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

Please refer to letter

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3186.D2//H16.03	Nurden, Ms Jan			28/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to Gypsy and Traveller Sites

Item	Question	Representation Text	Yes	No
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2	2	Policy Number H15, H16, H17		
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3	3	Paragraph or section number(s) section 5 housing		
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4	4	The Proposals Map	Yes	
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5	5	Inset Plan(s) Gypsy & traveller transit, residential and proposed sites	Yes	
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12	12	Site Reference H15, H16, H17		
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14	14	Representation		
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We wish to lodge a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash Our reasons for objection against Policies H15, H16 & H17 in the Local Development Plan are as follows; 1.Welsh Government guidelines say they should not be in a flood plain . 2.The two sites on Bradstreet Common are in the middle of a SSSI area or on the edge of one. 3.The two sites on Broadstreet Common are within the rural area and outside the environs of the village , such developments would have an adverse impact on the rural landscape. 4.The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites) 5.Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village . 6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within the flood plain or outside the environs of the village, and that there is no mains sewerage in parts of the village.

15	15	Do you want to speak at Public Examination?	No	
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Item	Question	Soundness Test	Yes	No
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1	1	I think the LDP is sound.	No	
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13	13	Test of Soundness please refer to letter		
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Item	Question	Tick-box reply
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10	10	Delete an existing site.	Yes
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3186.D3//H17	Nurden, Ms Jan			28/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objection to the proposed Gypsy and Traveller policies

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
2	2	Policy Number H15, H16, H17		
3	3	Paragraph or section number(s) section 5 Housing		
4	4	The Proposals Map		Yes
5	5	Inset Plan(s) Gypsy & Traveller transit, residential and proposed sites		
12	12	Site Reference H15, H16, H17		
14	14	Representation We wish to lodge a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash Our reasons for objection against Policies H15, H16 & H17 in the Local Development Plan are as follows; 1.Welsh Government guidelines say they should not be in a flood plain . 2.The two sites on Bradstreet Common are in the middle of a SSSI area or on the edge of one. 3.The two sites on Broadstreet Common are within the rural area and outside the environs of the village , such developments would have an adverse impact on the rural landscape. 4.The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites) 5.Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village . 6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within the flood plain or outside the environs of the village, and that there is no mains sewerage in parts of the village.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Please refer to letter		
10	10	Delete an existing site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3186.D4//H15.02	Nurden, Ms Jan			28/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Delete site H15 (ii) from the deposit LDP

Item Question Representation Text

14 14 Representation

We wish to lodge a formal objection to the inclusion in the LDP of proposed Gypsy / Traveller sites within the rural village of Nash Our reasons for objection against Policies H15, H16 & H17 in the Local Development Plan are as follows; 1.Welsh Government guidelines say they should not be in a flood plain . 2.The two sites on Bradstreet Common are in the middle of a SSSI area or on the edge of one. 3.The two sites on Broadstreet Common are within the rural area and outside the environs of the village , such developments would have an adverse impact on the rural landscape. 4.The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children. (In recent years an adult drowned in the reen adjacent to these sites) 5.Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village . 6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within the flood plain or outside the environs of the village, and that there is no mains sewerage in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3189.D1//H15.02	Underwood, A K			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objections to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Having been a resident of Nash all my life I am well aware that any applications for planning permission for new houses have been refused because of the Newport City Council policy of not allowing development within the flood plain, together with the lack of mains sewerage in many parts of the village. These factors have therefore helped to limit the size of the community at Nash, there being only just over 200 names shown on the Electoral Register for Nash village.

Welsh Government guidelines say that Gypsy/Traveller sites should not be located within a flood plain. They also say that the sites should not be so large as to dominate the nearest settled community. As one of these proposed sites could house more than 100 people and all are located within a flood plain I find it hard to believe NCC considers Nash to be a suitable place for one site let alone three.

When you add the additional factors of important SSSI areas being next to two of the proposed sites, and the adverse impact these developments will have on the rural landscape it is hard to see how Nash can be considered for such development at all as it doesn't fit any of the above criteria.

It appears in it's desperation to prove that it is providing places for Travellers NCC have not only ignored Welsh Government guidelines but also backtracked on its own previous policies.

Do recommended criteria no longer apply when looking for the path of least resistance? There are many other potential locations around Newport that better fit the Welsh Government recommendations. Have these areas not been considered because the nearby communities are larger or have more influence residents that may put up a greater fight against developments.

How can an 'official' temporary site have been granted at Queensway Meadows without being subjected to any planning process? Travellers have been continually moved on from this location for years, so why are they now being allowed to stay for two years? Surely if they have no inclination to move on during this time these people can hardly be called 'Travellers'.

My objections are not targeted at the lifestyle these people choose to lead but against the way that local people have been restricted and hindered for so long regarding property and land that has been in their family for generations.

Suddenly previous planning restrictions no longer seem to matter when NCC are obliged to find somewhere to site the Travelling (or static) community.

15 15	Do you want to speak at Public Examination?	Neither
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Item Question Soundness Test

1 1	I think the LDP is sound.	Neither
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3189.D2//H16.02	Underwood, A K			04/07/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objections to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Having been a resident of Nash all my life I am well aware that any applications for planning permission for new houses have been refused because of the Newport City Council policy of not allowing development within the flood plain, together with the lack of mains sewerage in many parts of the village. These factors have therefore helped to limit the size of the community at Nash, there being only just over 200 names shown on the Electoral Register for Nash village.

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Suddenly previous planning restrictions no longer seem to matter when NCC are obliged to find somewhere to site the Travelling (or static) community.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3189.D3//H17	Underwood, A K			04/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objections to policies H15, H16 and H17

Item Question Representation Text

14 14 Representation

Having been a resident of Nash all my life I am well aware that any applications for planning permission for new houses have been refused because of the Newport City Council policy of not allowing development within the flood plain, together with the lack of mains sewerage in many parts of the village. These factors have therefore helped to limit the size of the community at Nash, there being only just over 200 names shown on the Electoral Register for Nash village.

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15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3189.D4//H16.03	Underwood, A K			28/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Delete site H16 (iii) from deposit LDP

Item Question Representation Text

14 14 Representation

Having been a resident of Nash all my life I am well aware that any applications for planning permission for new houses have been refused because of the Newport City Council policy of not allowing development within the flood plain, together with the lack of mains sewerage in many parts of the village. These factors have therefore helped to limit the size of the community at Nash, there being only just over 200 names shown on the Electoral Register for Nash village.

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When you add the additional factors of important SSSI areas being next to two of the proposed sites, and the adverse impact these developments will have on the rural landscape it is hard to see how Nash can be considered for such development at all as it doesn't fit any of the above criteria.

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Suddenly previous planning restrictions no longer seem to matter when NCC are obliged to find somewhere to site the Travelling (or static) community.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3191.D1	University of Wales Newport			28/05/2012	<input type="checkbox"/>	W	S		M	

Document:Deposit Plan, p.0

Summary: Generally supporting the LDP

Item Question Representation Text

14 14 Representation
The University is generally in support of the plan.

15 15 Do you want to speak at Public Examination? Neither

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

3192.D1	Godber, Mr Stephen			28/05/2012	<input type="checkbox"/>	W	S		M	
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Document:Deposit Plan, p.0

Summary: Supporting the plan in relation to Rhiwderin.

Item Question Representation Text

14 14 Representation
I support the plan as it relates to Rhiwderin and the surrounding area.

15 15 Do you want to speak at Public Examination? Neither

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3193.D1	1st Wentworth Scout Group			28/05/2012	<input type="checkbox"/>	W	S		M	

Document:Deposit Plan, p.0

Summary: Supporting the LDP including area around Llanvaches and base of the 1st Wentwood Scout Group.

Item Question Representation Text

14 14 Representation

We support the LDP as it applies to the area around Llanvaches and the base of the 1st Wentwood Scout Group.

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

3194.D1//SP05	Womack, Mrs Marilyn			27/05/2012	<input type="checkbox"/>	W			M	
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Document:Deposit Plan, p.18

Policy: SP05

Summary: Support the desingation of countryside & special landscape areas in the Graig Ward and highlight the importance of considering pressure from proposed development

Item Question Representation Text

14 14 Representation

I support the plan in its entirety especially as it applies to the Graig Ward, with the surrounding countryside continuing to be designated Countryside and Special Landscape Area I would point out that existing housing developments within the Graig Ward, which have been agreed but not yet commenced or completed, will put further pressure on the existing infrastructure as relates to, the local primary and secondary schools which are currently full, the access and egress from the section of the A4072 (Forge Road), between the roundabout at Bassaleg, and the motorway which is already at maximum capacity. This congestion will be further exacerbated by further housing developments northwards on the A467 which is outside the Newport City Council boundary and over which the Newport City Council will have no control.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3194.D2//CF07	Womack, Mrs Marilyn			27/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.103

Policy: CF07

Summary: Request the continued protection of allotment within Graig in perpetuity

Item Question Representation Text

14 14 Representation

I would further comment that the old allotments at Rhiwderin have been granted planning consent for housing and that an area outside the village boundary which was previously designated Countryside and Special Landscape Area has been allocated as an area for replacement allotments. We would request that the newly designated allotments are protected against development and will remain allotments in perpetuity.

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3195.D1//H01.14	Redrow Homes South Wales Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 236/198.C1 Monmouthshire Bank Sidings

Policy: H01.14

Summary: Supports allocation of site in deposit LDP

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number H1 (14)
4	4	The Proposals Map H1 (14)
11	11	Site Name Monmouthshire Bank Sidings (MBS)
12	12	Site Reference H1 (14)

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Background to MBS site

The MBS site was first identified as having potential for housing purposes in the mid 1990s. It is currently allocated for 450 dwellings under Policy H1 (44) of the Adopted Newport UDP (2006). The site is identified alongside the Whitehead Works (WW) for residential, B1 and B8 and Health Trust uses under Policy ED2 (vii) of the UDP.

An outline application for residential development of up to 850 dwellings on MBS was submitted to NCC in May 2007. An appeal was made against non determination and the scheme was subsequently changed through master planning as part of the appeal to show a scheme for 575 dwellings. The appeal was subsequently allowed and permission granted in January 2011.

The key issues between the Appellants and the Council at the appeal were whether the site should be brought forward only in conjunction with the adjacent WW site as part of a comprehensively planned regeneration site, whether a single access point was sufficient to serve the site and, whether the site should be developed in entirety for residential use.

The Inspector's recommendation, endorsed by the Minister's final decision on the appeal, concluded that the site was suitable for residential development and could come forward independently of the adjacent WW site. It was also concluded that the site did not need a secondary means of vehicular access.

The conclusion that the site was previously developed and in a highly sustainable urban location was firm, and should provide the LPA with the confidence that MBS should remain as an allocated site for housing development as part of the LDP. The continued allocation is therefore supported.

Support for Policy H1(14)

RHSW are committed to developing the site in the short term and have recently engaged with the Authority to revise the access position in order to ensure its deliverability and, have been engaging with the Authority with regard to detail matters in respect of the reserved matters application.

It is anticipated that a reserved matters application will be submitted in within the coming weeks, with site preparation for development already commenced. Commencement of development of the proposed housing is anticipated in September 2012.

Support is therefore provided for the identification of the site as a housing commitment, to be delivered within the plan period.

15	15	Do you want to speak at Public Examination?							No	
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<i>Item Question</i>	<i>Soundness Test</i>									
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1	1	I think the LDP is sound.							No	
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3195.D2//H01.14	Redrow Homes South Wales Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Policy: H01.14

Summary: Delete reference to Monmouthshire Sidings site in Chapter 14: SPG Monbank Sidings/ Whitehead Works Planning Framework.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>
3	3	Paragraph or section number(s) Chapter 14	
11	11	Site Name Monmouthshire Bank Sidings	
12	12	Site Reference Chapter 14	
14	14	Representation Reference is made within the SPG table at Chapter 14 to the MBS / WW Planning Framework as adopted in January 2010. The stated intention is to revise and re-adopt the SPG to reflect the planning permission on the MBS site. For the reasons set out in detail within the Inspector's report into the MBS inquiry, there is no longer a requirement for any SPG in relation to the MBS site. The permission on the MBS site was delayed unnecessarily due to the Council's desire to develop the MBS and WW sites in accordance with a combined SPG or masterplan. The Inspector came to the firm conclusion that this was not necessary and there would be no prejudice to the comprehensive development of the two sites if they were to come forward individually as is now the likely case. As a consequence, reference to the MBS / WW sites SPG should be deleted from Chapter 14. Change sought: delete all references to the MBS / WW sites from the SPG table in Chapter 14.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness Fails C1, CE1, and CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3195.D3//EM02.11	Redrow Homes South Wales Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.78

Site: 437/ Monmouthshire Bank Sidings

Delete Site

Policy: EM02.11

Summary: Remove site as regeneration site - Monmouthshire Bank Sidings.

Item Question Representation Text

2 2 Policy Number

EM2(xi)

3 3 Paragraph or section number(s)

Paragraph 6.36 - Cardiff Road, Monmouthshire Banks Sidings

4 4 The Proposals Map

EM2(xi)

11 11 Site Name

Monmouthshire Bank Sidings

12 12 Site Reference

EM2(xi)

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Objection to Policy EM2(xii) and the allocation on the Proposals Map

The DLDP refers to an area of 1.26Ha of the MBS site under regeneration policy EM2(xi). For the reasons set out in full below, an objection is raised to this policy on the basis that it is unnecessary.

The land identified un EM2(xi) (referred to accurately at the appeal as 1.2ha) was also considered at the recent public inquiry but on the basis that there were no land use proposals for it. As such it was included as "White land" within the red line of the appeal submission.

The land was left devoid of a proposal (other than to accommodate a new access to the site) in order to allow for some potential for mixed use within the MBS site in the future should the adjacent WW site come forward for mixed use development.

The need to reserve the 1.2 ha for employment or health care uses was considered at the public inquiry.

Lack of justification for Health Care reference

It was established at the inquiry that there was no need to retain this land for any healthcare uses and that despite the long term aspiration of NCC to see the MBS and WW sites developed for high profile health care uses, there was no evidence of any demand from the health board or any aspirations to develop the site other than from the Local Authority / Newport Unlimited.

This matter has been debated for a long period of time, as far back as the UDP inquiry in 2003 where it was also established that there was no firm justification for reserving the sites for the healthcare uses.

There remains no justification for retaining the land for healthcare use and as such, objections are made below to the policy and to the reference to health care uses.

Lack of justification for B1/B8 references

The NCC adopted a brief for the MBS / WW sites entitled "Monmouthshire Bank Sidings/Whiteheads Draft Planning Framework SPG" prior to the public inquiry. This set out preferred strategic connections and land uses across the two sites, including that the northern section of the MBS site should be reserved for employment uses (circa 11ha).

Comprehensive objections were made on behalf of Network Rail (the landowners at the time) and RHSW to the brief. Objections were made on the basis that the planning brief / SPG should carry little or no weight given the lack of justification for employment / hospital uses within the site, that it would undermine the ability to progress regeneration across the two sites and, that there was no justification for requiring a southern access. The fundamental objection was that the MBS and WW sites did not need to be brought forward under the terms of the planning brief.

Importantly, the Inspector agreed with a number of the objections expressed and ultimately gave very little weight to the brief in terms of the distribution of land uses within the MBS site.

Paragraph 209 of the Inspector's report into the MBS inquiry concluded that there is adequate supply of employment land in Newport, in particular noting it was established that 65 years worth of unconstrained employment land was available.

The Inspector concluded at paragraph 214 that "the need for additional employment land to that allocated in the UDP and which was considered as part of the context of the H1 and other allocations, is not made out. Therefore, I have forwarded this material consideration little weight".

Therefore, the Inspector came to the firm conclusion that there was no need to retain any part of the MBS site (including the land identified under EM2(xi) site) for employment use.

The Inspector was principally concerned with the connections between MBS and WW rather than the distribution of land uses within the MBS site. It was fully accepted that the MBS site carried an allocation for residential use and that this should take precedent over any encouragement under the regeneration policies within the UDP.

The Planning Framework SPG has now been superseded through the grant of planning permission on the MBS site. It was found to be of limited weight in the appeal process itself in terms of land uses and, has been overtaken in terms of the Inspectors conclusions on the access needs for to the site. Essentially, the adopted brief is now defunct and should have no material impact upon allocations

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

The EM2(xi) is dealt with as part of a unilateral undertaking in respect of the MBS permission. The UU identifies 1.2ha of the site for possible employment purposes, within the locations identified on the DLDP proposals maps under EM2(xi). The developer is required to undertake a joint marketing strategy for a period of two years following the implementation of development on the site to secure and promote the land for employment purposes. The UU restrict the end users to B1 planning uses only. In the event that a marketing strategy does not identify a commercial developer who is willing to proceed, then the developer will discuss with the Council the potential future planning uses of the land.

Given the abundant supply of employment land within Newport, and the conclusions of the Inspector, it would be practical to plan for flexibility of the use of the EM2(xi) land to be considered within the life of the plan.

There is no justification for including the EM2(xi) land within the regeneration site policies. Instead it should either be referred to as 'White Land' within the plan. The site is within settlement boundaries and would be suitable for assessment against general development control policies for a variety of uses. This would allow for a range of uses including those put forward under EM2(xi), subject to the normal development control tests. This would retain ultimate flexibility for the land and, should the best efforts to comply with the terms of the UU not yield a B1 user within a reasonable timeframe, it would allow for alternative forms of development of this sustainable brownfield site.

Change sought: deletion of reference to the MBS site from Policy EM2(xi) and removal of the same notation from the proposals map. For clarity, policy annotation H1(14) should be retained as it is.

Should the Council disagree with the removal of the allocation, policy EM2(xi) should reflect the terms of the UU in terms of the use specified (i.e. B1), to accurately specify the area, and, include flexibility for alternative residential uses.

Change sought should EM2(xi) not be deleted: revise EM2(xi) to read CARDIFF ROAD (MONMOUTHSHIRE BANK SIDINGS) 1.2 HECTARES B1 OR RESIDENTIAL USES;

Objection to paragraph 6.36 – Cardiff Road, Monmouthshire Banks Sidings

Reference is made under supporting text to EM2 (paragraph 6.36) to the northern part of the site close to Cardiff Road being identified for employment uses. This should be revised in line with any revision to EM2(xi) given that objections have been made to removing reference under EM2 to the site or and seeking to identify suitable uses as either B1 or residential.

Change sought: delete paragraph 6.36 or revise in line with changes to EM2(xi).

15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination The need to remove the allocation from the plan may be resolved by the time of the examination. A full update can be provided to consider the merits of the allocation.	
<i>Item Question</i> <i>Soundness Test</i>			
1	1	I think the LDP is sound.	No
13	13	Test of Soundness Fails C1, CE1, and CE4	
<i>Item Question</i>			<i>Tick-box reply</i>
10	10	Delete an existing site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3195.D4//H01.14	Redrow Homes South Wales Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.62

Site: 236/198.C1 Monmouthshire Bank Sidings

Policy: H01.14

Summary: Chapter 13: Clarify that provision of school facilities will be accommodated off site and not on the Mon bank sidings site.

Item	Question	Representation Text	Soundness Test
3	3	Paragraph or section number(s) Chapter 13	
7	7	A new paragraph or new text.	Yes
11	11	Site Name Monmouthshire Bank Sidings	
14	14	Representation Objection under Chapter 13 – Infrastructure Requirement Table 13.1 sets out the infrastructure necessary to deliver sites allocated within the LDP. MBS is referred to under H1(14). It should be made clear under the education infrastructure reference that the provision of a primary school is on an off site basis, and is not required to be provided within the MBS site. All of these matters have been resolved within the S106 for the extant outline permission in any event. Change sought: education reference to be changed within H1(14) of table 13.1 as follows - Provision or contribution towards an off site primary school and / or contribution to off site secondary school provision.	
15	15	Do you want to speak at Public Examination?	No
1	1	I think the LDP is sound.	No
13	13	Test of Soundness Fails C1, CE1, CE4	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3196.D1//CE05	Aneurin Bevan Health Board	Asbri Planning		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.49

Site: 412/ St Cadoc's

[Delete Site](#)

Policy: CE05

Map: Constraints Plan - East

Summary: Remove environmental space allocation at St Cadoc's, Caerleon.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number CE5
4	4	The Proposals Map Yes
11	11	Site Name St Cadocs Hospital

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

I refer to the current consultation where formal submissions are being invited on the Deposit Plan. In response please find enclosed representation forms which we are submitting on behalf of Aneurin Bevan Health Board.

You may recall that at the start of the plan process in 2009 Asbri Planning submitted 'Candidate Site' requests on behalf of the former Gwent Healthcare Trust which sought to promote the allocation of the hospital sites at St Cadocs, Royal Gwent Hospital and St Woolosfor residential - led uses.

The Deposit LDP does not allocate any of these sites for alternative forms of development, including St Cadoc's, where the Adopted Unitary Development Plan currently identifies the site for a residential led, mixed-use development under policy H1(46). The Health Board now however, accepts the situation whereby, given the uncertainty over the timing of the releases of the land in the remaining Plan period, i.e. 2011 – 2026, no housing land allocations are appropriate.

In this context it is accepted that the inclusion of the hospital sites within urban boundaries allows for potential future development on the whole or parts of the sites as brownfield, windfall releases, and that a future review of the Plan can also allow for development in the event that land becomes available.

The Health Board remains concerned, however, regarding the continued safeguarding of land within the St Cadocs Hospital site for open space and a railway halt. We therefore wish to object to the related policies, CE5 and T1, as they apply to this site and to their identification on the Proposals Map.

A further concern relates to the Deposit Plan allocation of 400 dwellings at the former Whiteheads Works under Policy H1 (51). Whilst the site is also allocated for residential uses in the Unitary Development Plan under Policy H1 (50), opportunities for health uses are acknowledged in view of the proximity to the Royal Gwent Hospital and reference is made to the need for a brief to secure a comprehensive regeneration of the area which is partly in public and partly in private ownership. No such reference is made in the context of the new Deposit LDP.

The reasons are explained further below under the appropriate site headings.

St Cadoc's Hospital

In the text which refers to the St Cadocs site (paragraphs 5.5 to 5.7) it is stated that if the site were to become available during the Plan period, it would be assessed as a brownfield site within the urban boundary, and as such would satisfy relevant policies in the Plan. However, only those parts of the site covered by the hospital buildings are referred to in this context, and the Council still intends to safeguard what it describes as the "remaining western environmental space" and to continue to include provision for a railway station. These are covered by LDP policies CE5 (Environmental Spaces) and T1 (Railways).

The site will continue to provide health services, with related office accommodation for the foreseeable future, dependent on the timescale of the Llanfrecfa proposals and subsequent reviews of health provision. The recent planning application for the A & T Unit, which affects the area subject to open space proposals, demonstrates the extent to which there is need for flexibility in order to accommodate future health initiatives which may emerge.

The original leisure allocation (CE34 in the Unitary Development Plan), as well as serving open space requirements generated by proposals for 250 dwellings, was included primarily to seek to satisfy the need for sports provision for Newport University. This requirement has now been abandoned.

If future intentions are focused on health rather than housing development there will not be any need to safeguard open space. As such the continued identification of the western part of the site as subject to the 'environmental space' policy cannot be justified. Sufficient ancillary space exists in the form of large grassed areas which are spread throughout the site, as well as wooded belts. These function for the benefit of users of the site (employees, patients, service users, visitors).

Whilst the site continues to be in operational health use the provision of the railway halt is also unlikely, and again would require proper consideration in the context of a future comprehensive scheme. With this in mind the Council need to look at alternative locations along the railway corridor.

We therefore object to the proposed retention of the environmental space and railway allocations under Policies CE5 (Environmental Spaces) and T1 (Railways) on the above grounds;
Conclusions

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Aneurin Bevan Health Board wish to object to the following for the above reasons:

- The allocation of land as Environmental Space within the grounds of St Cadocs Hospital under Deposit Plan Policy CE5;
- The allocation of land for a new railway station within the grounds of St Cadocs Hospital under Deposit Plan Policy T1;
- The allocation of land for 400 dwellings on the former Whiteheads Works under Policy H1 (51).

The Proposals Maps are also objected to on the above grounds.

In terms of the prescribed Test of Soundness the above proposals are not "compatible with achieving a coherent strategy from which its policies and allocations logically flow", and "are not reasonably flexible to enable it (the Plan) to deal with changing circumstances". They therefore conflict with Tests CE1 and CE4. Consequently these are referred to in the accompanying Representation Forms.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination To present evidence directly before the Inspector								
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Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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13	13	Test of Soundness CE1, CE4								
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3196.D2//H01.51	Aneurin Bevan Health Board	Asbri Planning		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.64

Site: 436/ Whiteheads Works

Delete Site

Policy: H01.51

Map: Constraints Plan - West

Summary: Delete housing allocation at Whiteheads Works

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number H1 (51)
4	4	The Proposals Map Yes
11	11	Site Name Former Whiteheads Site
12	12	Site Reference H1 (51)

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

I refer to the current consultation where formal submissions are being invited on the Deposit Plan. In response please find enclosed representation forms which we are submitting on behalf of Aneurin Bevan Health Board.

You may recall that at the start of the plan process in 2009 Asbri Planning submitted 'Candidate Site' requests on behalf of the former Gwent Healthcare Trust which sought to promote the allocation of the hospital sites at St Cadocs, Royal Gwent Hospital and St Woolosfor residential - led uses.

The Deposit LDP does not allocate any of these sites for alternative forms of development, including St Cadoc's, where the Adopted Unitary Development Plan currently identifies the site for a residential led, mixed-use development under policy H1(46). The Health Board now however, accepts the situation whereby, given the uncertainty over the timing of the releases of the land in the remaining Plan period, i.e. 2011 – 2026, no housing land allocations are appropriate.

In this context it is accepted that the inclusion of the hospital sites within urban boundaries allows for potential future development on the whole or parts of the sites as brownfield, windfall releases, and that a future review of the Plan can also allow for development in the event that land becomes available.

The Health Board remains concerned, however, regarding the continued safeguarding of land within the St Cadocs Hospital site for open space and a railway halt. We therefore wish to object to the related policies, CE5 and T1, as they apply to this site and to their identification on the Proposals Map.

A further concern relates to the Deposit Plan allocation of 400 dwellings at the former Whiteheads Works under Policy H1 (51). Whilst the site is also allocated for residential uses in the Unitary Development Plan under Policy H1 (50), opportunities for health uses are acknowledged in view of the proximity to the Royal Gwent Hospital and reference is made to the need for a brief to secure a comprehensive regeneration of the area which is partly in public and partly in private ownership. No such reference is made in the context of the new Deposit LDP.

The reasons are explained further below under the appropriate site headings.
Whiteheads Site

Currently part of the site proposed as a housing land allocation under Policy H1 (51) – 18.7 hectares, 400 units, provides additional parking provision on an area leased from the Welsh Government on the former Whitehead works site for 290 spaces. Additional land may be required for further provision.

The adjacent site to the west, the Monmouthshire Bank Sidings (H1 (14) in the Deposit Plan), is identified as a committed housing site (with planning permission) for 545 units. A remaining business occupies retained buildings between the two sites.

As well as the need to consider future parking and other operational requirements, options for the future of the nearby Royal Gwent site are linked to the former Whiteheads land. These have included proposals for a new Newport Local General Hospital. Whilst the preferred way forward remains unresolved and is subject to a number of considerations, a sufficient degree of flexibility is required in order that any future health related developments could be accommodated on a site which, in terms of location offers the best option for complementary or replacement facilities for the Royal Gwent Hospital as it benefits from proximity to the City Centre.

Rather than a specific housing land allocation, therefore the site should be included within the urban boundary in order to allow for consideration of various uses, or a combination, which may emerge during the Plan period.

Objections are therefore submitted to the housing allocation on the Whitehead site - H1 (51) on the grounds that part, or all of the site may be required for healthcare purposes within the Plan period. Furthermore objections are also made to the 400 dwelling numbers proposed on the Whiteheads site on the grounds that a proportion of the site will need to be retained for car parking to serve the Royal Gwent Hospital.

Conclusions

Aneurin Bevan Health Board wish to object to the following for the above reasons:

- The allocation of land as Environmental Space within the grounds of St Cadocs Hospital under Deposit Plan Policy CE5;

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- The allocation of land for a new railway station within the grounds of St Cadocs Hospital under Deposit Plan Policy T1;
- The allocation of land for 400 dwellings on the former Whiteheads Works under Policy H1 (51).

The Proposals Maps are also objected to on the above grounds.

In terms of the prescribed Test of Soundness the above proposals are not “compatible with achieving a coherent strategy from which its policies and allocations logically flow”, and “are not reasonably flexible to enable it (the Plan) to deal with changing circumstances”. They therefore conflict with Tests CE1 and CE4. Consequently these are referred to in the accompanying Representation Forms.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination To present evidence directly before the Inspector								
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Item Question *Soundness Test*

1	1	I think the LDP is sound.								No
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13	13	Test of Soundness CE1, CE4								
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Item Question

Tick-box reply

10	10	Delete an existing site.								Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3196.D3//T1	Aneurin Bevan Health Board	Asbri Planning		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.82

Site: 413/ St Cadoc's

[Delete Site](#)

Policy: T1

Summary: Object to railway station allocation at St Cadoc's site within the LDP

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2 2	Policy Number	T1
4 4	The Proposals Map	Yes
11 11	Site Name	St cadocs Hospital

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Re: Newport Deposit Local Development Plan (LDP): Representations on behalf of Aneurin Bevan Health Board

I refer to the current consultation where formal submissions are being invited on the Deposit Plan. In response please find enclosed representation forms which we are submitting on behalf of Aneurin Bevan Health Board.

You may recall that at the start of the plan process in 2009 Asbri Planning submitted 'Candidate Site' requests on behalf of the former Gwent Healthcare Trust which sought to promote the allocation of the hospital sites at St Cadocs, Royal Gwent Hospital and St Woolosfor residential - led uses.

The Deposit LDP does not allocate any of these sites for alternative forms of development, including St Cadoc's, where the Adopted Unitary Development Plan currently identifies the site for a residential led, mixed-use development under policy H1(46). The Health Board now however, accepts the situation whereby, given the uncertainty over the timing of the releases of the land in the remaining Plan period, i.e. 2011 – 2026, no housing land allocations are appropriate.

In this context it is accepted that the inclusion of the hospital sites within urban boundaries allows for potential future development on the whole or parts of the sites as brownfield, windfall releases, and that a future review of the Plan can also allow for development in the event that land becomes available.

The Health Board remains concerned, however, regarding the continued safeguarding of land within the St Cadocs Hospital site for open space and a railway halt. We therefore wish to object to the related policies, CE5 and T1, as they apply to this site and to their identification on the Proposals Map.

A further concern relates to the Deposit Plan allocation of 400 dwellings at the former Whiteheads Works under Policy H1 (51). Whilst the site is also allocated for residential uses in the Unitary Development Plan under Policy H1 (50), opportunities for health uses are acknowledged in view of the proximity to the Royal Gwent Hospital and reference is made to the need for a brief to secure a comprehensive regeneration of the area which is partly in public and partly in private ownership. No such reference is made in the context of the new Deposit LDP.

The reasons are explained further below under the appropriate site headings.

St Cadoc's Hospital

In the text which refers to the St Cadocs site (paragraphs 5.5 to 5.7) it is stated that if the site were to become available during the Plan period, it would be assessed as a brownfield site within the urban boundary, and as such would satisfy relevant policies in the Plan. However, only those parts of the site covered by the hospital buildings are referred to in this context, and the Council still intends to safeguard what it describes as the "remaining western environmental space" and to continue to include provision for a railway station. These are covered by LDP policies CE5 (Environmental Spaces) and T1 (Railways).

The site will continue to provide health services, with related office accommodation for the foreseeable future, dependent on the timescale of the Llanfrechfa proposals and subsequent reviews of health provision. The recent planning application for the A & T Unit, which affects the area subject to open space proposals, demonstrates the extent to which there is need for flexibility in order to accommodate future health initiatives which may emerge.

The original leisure allocation (CE34 in the Unitary Development Plan), as well as serving open space requirements generated by proposals for 250 dwellings, was included primarily to seek to satisfy the need for sports provision for Newport University. This requirement has now been abandoned.

If future intentions are focused on health rather than housing development there will not be any need to safeguard open space. As such the continued identification of the western part of the site as subject to the 'environmental space' policy cannot be justified. Sufficient ancillary space exists in the form of large grassed areas which are spread throughout the site, as well as wooded belts. These function for the benefit of users of the site (employees, patients, service users, visitors).

Whilst the site continues to be in operational health use the provision of the railway halt is also unlikely, and again would require proper consideration in the context of a future comprehensive scheme. With this in mind the Council need to look at alternative locations along the railway corridor.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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We therefore object to the proposed retention of the environmental space and railway allocations under Policies CE5 (Environmental Spaces) and T1 (Railways) on the above grounds;
Conclusions

Aneurin Bevan Health Board wish to object to the following for the above reasons:

- The allocation of land as Environmental Space within the grounds of St Cadocs Hospital under Deposit Plan Policy CE5;
- The allocation of land for a new railway station within the grounds of St Cadocs Hospital under Deposit Plan Policy T1;
- The allocation of land for 400 dwellings on the former Whiteheads Works under Policy H1 (51).

The Proposals Maps are also objected to on the above grounds.

In terms of the prescribed Test of Soundness the above proposals are not "compatible with achieving a coherent strategy from which its policies and allocations logically flow", and "are not reasonably flexible to enable it (the Plan) to deal with changing circumstances". They therefore conflict with Tests CE1 and CE4. Consequently these are referred to in the accompanying Representation Forms.

15	15	Do you want to speak at Public Examination?								Yes
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16	16	Subject to speak on at Examination								
To present evidence directly before the Inspector.										

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness CE1, CE4	
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<i>Item</i>	<i>Question</i>	<i>Tick-box reply</i>
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3197.D1//H15.02	Ryall, R E			29/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Delete Queensway Meadows site from LDP

Item Question Representation Text

14 14 Representation

I am writing to register my objections to Policies H15 H16 and H17.

Planning permission has been virtually impossible to obtain in Nash for its residents for many years and even when granted what has been allowed has been limited. Reasons cited for this lack of development are regularly that the area resides within a flood plain and the lack of mains drainage.

These factors have not suddenly disappeared. Many of the residents are still using cesspits and i am regu-larly reminded when I renew my house insurance and at times of high tide by the Environment Agency Flood Line that my property is at risk of flooding. How then can Newport City Council consider Nash a suitable area for not one but three traveller sites, when Welsh Government Guidelines say these sites should not be within a flood plain?

Another reason given for refusing planning consent regarded access to and from property onto the highway. The proposed Broadstreet Common sites are therefore unsuitable for the movement of caravans, horse boxes and pick up trucks etc. being positioned very close to a sharp bend, the site of numerous bumps in the past.

As residents we have been reminded on many occasions that we live in an SSSI area that must be pre-served. I find it hard to believe that a transient population will treat these areas with such respect.

If NCC feels the need for development at Nash why not build some affordable housing so that young local people could afford to stay in the area. In addition a Residential Care Home so that the local elderly when no longer able to manage in their own homes could stay dose to friends and neighbours in Nash instead of being sent miles away.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3197.D2//H16.02	Ryall, R E			28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Wants Former Army Barracks, Pye Corner deleted from LDP

Item Question Representation Text

14 14 Representation

I am writing to register my objections to Policies H15 H16 and H17.

Planning permission has been virtually impossible to obtain in Nash for its residents for many years and even when granted what has been allowed has been limited. Reasons cited for this lack of development are regularly that the area resides within a flood plain and the lack of mains drainage.

These factors have not suddenly disappeared. Many of the residents are still using cesspits and i am regu-larly reminded when I renew my house insurance and at times of high tide by the Environment Agency Flood Line that my property is at risk of flooding. How then can Newport City Council consider Nash a suitable area for not one but three traveller sites, when Welsh Government Guidelines say these sites should not be within a flood plain?

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As residents we have been reminded on many occasions that we live in an SSSI area that must be pre-served. I find it hard to believe that a transient population will treat these areas with such respect.

If NCC feels the need for development at Nash why not build some affordable housing so that young local people could afford to stay in the area. In addition a Residential Care Home so that the local elderly when no longer able to manage in their own homes could stay dose to friends and neighbours in Nash instead of being sent miles away.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3197.D3//H16.03	Ryall, R E			28/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Map: Constraints Plan - East

Summary: Delete Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Corner, Nash, from LDP

Item Question Representation Text

14 14 Representation

I am writing to register my objections to Policies H15 H16 and H17.

Planning permission has been virtually impossible to obtain in Nash for its residents for many years and even when granted what has been allowed has been limited. Reasons cited for this lack of development are regularly that the area resides within a flood plain and the lack of mains drainage.

These factors have not suddenly disappeared. Many of the residents are still using cesspits and i am regu-larly reminded when I renew my house insurance and at times of high tide by the Environment Agency Flood Line that my property is at risk of flooding. How then can Newport City Council consider Nash a suitable area for not one but three traveller sites, when Welsh Government Guidelines say these sites should not be within a flood plain?

Another reason given for refusing planning consent regarded access to and from property onto the highway. The proposed Broadstreet Common sites are therefore unsuitable for the movement of caravans, horse boxes and pick up trucks etc. being positioned very close to a sharp bend, the site of numerous bumps in the past.

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If NCC feels the need for development at Nash why not build some affordable housing so that young local people could afford to stay in the area. In addition a Residential Care Home so that the local elderly when no longer able to manage in their own homes could stay dose to friends and neighbours in Nash instead of being sent miles away.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3197.D4//H17	Ryall, R E			28/05/2012	<input type="checkbox"/>	P			M	

Document:Deposit Plan, p.72

Policy: H17

Summary: Objects to policy H17 Gypsy and Traveller Accommodation Proposals

Item Question Representation Text

14 14 Representation

I am writing to register my objections to Policies H15 H16 and H17.

Planning permission has been virtually impossible to obtain in Nash for its residents for many years and even when granted what has been allowed has been limited. Reasons cited for this lack of development are regularly that the area resides within a flood plain and the lack of mains drainage.

These factors have not suddenly disappeared. Many of the residents are still using cesspits and i am regu-larly reminded when I renew my house insurance and at times of high tide by the Environment Agency Flood Line that my property is at risk of flooding. How then can Newport City Council consider Nash a suitable area for not one but three traveller sites, when Welsh Government Guidelines say these sites should not be within a flood plain?

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As residents we have been reminded on many occasions that we live in an SSSI area that must be pre-served. I find it hard to believe that a transient population will treat these areas with such respect.

If NCC feels the need for development at Nash why not build some affordable housing so that young local people could afford to stay in the area. In addition a Residential Care Home so that the local elderly when no longer able to manage in their own homes could stay dose to friends and neighbours in Nash instead of being sent miles away.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3198.D1//H15.02	Mason, Mr I			28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Map: Constraints Plan - East

Summary: Objects to Gypsy and Traveller Transit Accommodation - Queensway Meadows site.

Item Question Representation Text

14 14 Representation

Our reasons for objections against Policies H15, H16 and H17 in the Local Development Plan are as follows;

1. Welsh Government guidelines say they should not be in a flood plain.
2. The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.
3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.
4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).
5. Welsh Government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3198.D2//H16.02	Mason, Mr I			28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Wants Gypsy and Traveller Residential Accommodation - Former Army Barracks, Pye Corner, Nash removed from LDP

Item Question Representation Text

14 14 Representation

Our reasons for objections against Policies H15, H16 and H17 in the Local Development Plan are as follows;

1. Welsh Government guidelines say they should not be in a flood plain.
2. The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.
3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.
4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).
5. Welsh Government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3198.D3//H16.03	Mason, Mr I			28/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Map: Constraints Plan - East

Summary: Wants Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Corner, Nash deleted from LDP

Item Question Representation Text

14 14 Representation

Our reasons for objections against Policies H15, H16 and H17 in the Local Development Plan are as follows;

1. Welsh Government guidelines say they should not be in a flood plain.
2. The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.
3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.
4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).
5. Welsh Government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3198.D4//H17	Mason, Mr I			28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objects to Gypsy and Traveller sites in Nash

Item Question Representation Text

14 14 Representation

Our reasons for objections against Policies H15, H16 and H17 in the Local Development Plan are as follows;

1. Welsh Government guidelines say they should not be in a flood plain.
2. The two sites on Broadstreet Common are in the middle of a SSSI area or on the edge of one.
3. The two sites on Broadstreet Common are within the rural area and outside the environs of the village such developments would have an adverse impact on the rural landscape.
4. The sites in Broadstreet Common are adjacent to deep reens which pose a drowning danger to gypsy children (in recent years and adult drowned in the reen adjacent to these sites).
5. Welsh Government guidelines state that sites should respect the scale and not be so large as to dominate the nearest settled community, and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans, and house more than 100 travellers. There are only just over 200 electors shown on the Electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Councils policy of not allowing development within a flood plain or outside the environs of the village and that there are no main sewers in parts of the village.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3199.D1/9.35/CF0	Alfieri, Mr Severino	K W Dorrington Architectural Services		28/05/2012	<input type="checkbox"/>	W			M	

Document: Deposit Plan, p.105, para.9.35

Policy: CF09

Summary: Wants amendments to allow conversion of agricultural building to residential holiday lets.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number CF9	
3	3	Paragraph or section number(s) 9.35	
5	5	Inset Plan(s) 11	
7	7	A new paragraph or new text.	Yes
14	14	Representation CF9 – TOURISM This proposed policy fully states the importance of Tourism to the local economy.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Change of use in countryside and conditions relating to.	
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
1	1	I think the LDP is sound.	No
<i>Item</i>	<i>Question</i>		<i>Tick-box reply</i>
8	8	Add a new site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3199.D2//H10	Alfieri, Mr Severino	K W Dorrington Architectural Services		28/05/2012	<input type="checkbox"/>	W			M	

Document:Deposit Plan, p.69

Policy: H10

Map: Inset 11: Llandevaud Village Boundary

Summary: Wants amendment to Policy to allow conversion of agricultural building to residential holiday lets.

Item Question Representation Text

2 2 Policy Number
H10

5 5 Inset Plan(s)
11

7 7 A new paragraph or new text. Yes

14 14 Representation

H10 – CONVERSIONS IN THE COUNTRYSIDE

This proposed policy lays down criteria for conversions to residential in the Open Countryside. It isn't specific whether/not this includes Holiday Lets / units that are not resided in for all months of the year or maximum numbers of months per year.

It could, as in this case, prevent this application site's agricultural buildings achieving Change of Use approval to Holiday Lets.

If this policy was to allow some overriding features it could allow a wider number of suitable buildings to be converted.

In particular if the reference to - ii) "the building has not been constructed in the last 30 years" was to have a caveat stating – subject to siting/privacy it would not preclude certain buildings.

After all if the building meets the criteria – but is in a poor location it may be unviable AND conversely if the siting is excellent and a successful business will be achieved, this will prevent the likelihood of a later Change of Use application to full residential use, subject to the building being unviable.

THE NEW PARAGRAPH COULD BE ADDED AS APPROPRIATE TO THE ABOVE PROPOSED POLICIES.

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
Change of use in countryside and conditions relating to.

Item Question Soundness Test

1 1 I think the LDP is sound. No

Item Question

Tick-box reply

8 8 Add a new site. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3199.D3//H01	Alfieri, Mr Severino	K W Dorrington Architectural Services		28/05/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.62

Site: 304/ Barn Farm Land

New Site

Policy: H01

Map: Inset 11: Llandevaud Village Boundary

Summary: Wants amendments to Policy to allow conversion of agricultural buildings to residential holiday lets.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
5	5	Inset Plan(s)	
		11	
7	7	A new paragraph or new text.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

This statement and documents are intended to vary the Proposed Policy regarding Changing the Use of existing agricultural buildings in the Open Countryside into Holiday Lets.

This document has additional details that can be used by the Council to ascertain how certain sites (that would currently fall outside the proposed policy) but should be viewed as acceptable.

SITE LOCATION-

The application site is located immediately adjoining the Llandeud Inset Map 11. A Location Plan is attached.

The land is agricultural.

PROPOSAL –

My client seeks to have a Use applied to his land to permit the Change of Use of the existing buildings to be used as residential Holiday Lets. The proposal is to convert the existing agricultural buildings into compact one / two bedroom self contained holiday lets. There is growing demand for this type of accommodation. The site affords excellent views over countryside towards Newport and would, without question be highly desirable. The scheme would encourage tourists to visit; currently Newport has a lack of such accommodation. The site falls just outside the Village Boundary of Llandeud. Ordinarily a relatively straight forward planning application would be lodged to seek planning consent; however the buildings do not have any real architectural merit and fall within Open Countryside, so would be refused. The site is used daily by my client. The site has a good access and is of an excellent size. The proposals would be carried with a scheme to improve visibility at the junction with the public highway. The scheme would not, in any manner, be of harm to the locality.

Sustainable use of land - Objective 1

To ensure that all development makes the most efficient use of natural Resources by seeking to locate development in the most sustainable locations, Minimises the impact on the environment and makes a positive contribution to local communities.

The buildings are existing agricultural buildings – they would be retained and adapted as necessary.

The buildings are immediately adjacent the existing and proposed Llandeud Village Plan. Despite being characterised as 'Open Countryside' in planning terms it could be viewed as a natural extension to the village boundary.

Utilising this land is a sustainable use of land – due to its location adjacent a built up area residential village.

Climate Change - Objective 2

To ensure that development and land uses in Newport make a positive contribution to helping to minimise the causes of climate change and to mitigating the impacts, by incorporating the principles of sustainable design, reducing the need to travel, providing safe and active travel routes, and managing the risks and consequences of flooding

The reuse of existing buildings and being converted to comply with current Building regulations is an extremely environmentally friendly type of development.

The Holiday Lets would be served by a Package Type Private Treatment plant – to serve foul drainage, thus not applying any additional pressure on the existing utility infrastructure.

The storm water would provide the opportunity to reuse 'grey' water, and then discharge to soakaways.

The development does not lie within a Flood Risk area; neither will the development increase the risk of flooding to any other property.

Economic Growth - Objective 3

To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region.

Newport has seen an increase in tourists. This is in part to the Ryder Cup being hosted in Celtic Manor in 2010.

There was a lack of quality tourist accommodation in the immediate area; however more appropriately a lack of variety.

Although Celtic Manor is a first class resort, it does not offer the less developed and more personal, tranquil setting that this site can offer.

Wales, from a Tourist point of view, projects itself as being quaint and of beautiful countryside. This project ticks both boxes –with stunning views over nearby countryside and within nearby access of a major road – the A48. It isn't hard to visualise the finished article in a holiday brochure.

The site is more consistent with Monmouthshire than Newport; and Monmouthshire fully value the importance of such Holiday lets.

The development, by means of being of great requirement would bring additional trade, albeit small, to this rural part of Newport.

Housing - Objective 4

To ensure that there is an adequate supply of land for housing in the most Sustainable locations, and to ensure that the quantity, quality and variety of

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Housing provision meets the needs of the population. Also to foster the Creation of places which contribute to local distinctiveness and thriving Communities.

The proposal is to change the Use of existing and currently used agricultural buildings into two compact sized holiday lets. They are not to be seen as permanent dwellings – a planning condition would be attached to enforce their numbers of months of use.

Conservation and the Environment

Objective 5

To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the built environment.

The buildings and access are existing. The access and buildings are currently used daily by the applicant.

The modifications would relatively minor, and would not be visible to the wider public. Cars would be parked to ensure that they are not visible to ensure that the area remains, visually, part of the countryside.

Objective 6

To protect and enhance the quality of the natural environment, including protected and non-protected species and habitats, regardless of Greenfield or Brownfield status, and also including the protection of controlled waters.

The proposed scheme would include a hedgerow planting scheme to the North boundary; as well as new hedgerow to the rear of the new visibility splay – both measures would enhance the visual appearance of the lane.

Community Facilities and Infrastructure - Objective 7

To ensure the provision of appropriate new, and/or enhanced existing, community facilities.

The development is minor and will not allow for any new community provisions.

Visually the lane will be improved.

Culture and Accessibility - Objective 8

The principle that services and facilities should be sustainable and safely accessible to all regardless of culture, age, gender, and impairment is considered important to achieving sustainable development. Development proposals should therefore provide convenience and enjoyment of use for all and strive to enhance cultural identity.

To ensure that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals.

The development will be fully disabled accessible.

HIGHWAYS AND PARKING-

The proposed Holiday Lets would use the existing access point onto the existing Llandevaud Road – an adopted Highway.

The scheme would include improving the visibility at the intersection with the public Highway – by means of a planted hedgerow set at the correct angle at the intersection to maximise visibility. The scheme would ensure that the maximum visibility is achieved at 2.4m from the road edge.

The scheme currently has an ad-hoc parking arrangement. The parking area is suitably large enough to permit a parking layout to the planners and Highways approval.

ACCESS STATEMENT-

The site is accessible by private transport; buses frequently use the A48 main trunk road. The lane, although narrow, is used frequently by walkers. There is no reason as to why users of the Holiday Lets could use the site exclusively by foot or cycle.

MOVEMENT WITHIN THE SITE-

The site, although close to bus routes, will make use of private cars and bicycles.

The occupiers / members of the public will continue to use the same vehicle access point, as detailed on the OS Plan.

The improved access point will improve the existing visibility at the access point to the roadway. There isn't a public footway at this part of the Lane. The pedestrians accessing the site will not feel at risk – this is reinforced by the number of dog walkers, joggers and local residents who regularly walk on the lane.

The site will have a level access into the proposed dwelling.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Yes							
16 16	Subject to speak on at Examination Change of use in countryside and conditions relating to.									
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
<i>Item Question Tick-box reply</i>										
8 8	Add a new site.		Yes							

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3200.D1//H01	Friel, Ms Jenny	K W Dorrington Architectural Services		18/06/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.62

Site: 287/ Yew Tree Cottage

New Site

Policy: H01

Summary: To allocate land for a dwelling in the open countryside

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number	
		SP5	
7	7	A new paragraph or new text.	Yes
11	11	Site Name	
		no	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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See documents, amend SP5 to allow development

This statement and documents are intended to vary the Proposed Policy regarding development in the Open Countryside and making allowance for certain small sites - such as this site.

The refused planning application (see below) has additional details that can be used by the Council to ascertain how certain sites (that would currently fall outside the proposed policy) but should be viewed as acceptable. The refused planning application includes all necessary details.

A planning application, for this scheme, was submitted; and subsequently refused on 18th January 2012. the application number was 11/1270

BACKGROUND-

My client owns this site and has significant rights over the adjoining land that is not under her control.

The Council have submitted an application to site a Traveller Site at this location. It is understood that the Council has obligations to find permanent sites for the Travelling Community.

It should also be understood that if that application were not to be approved, or the development not meet fruition that it would be unreasonable to refuse a single dwelling house (with considerable merit) on this site.

SITE LOCATION-

The application site is located immediately opposite my clients' bungalow. The application site is land under her sole ownership.

The overall site, although used exclusive by her, is not under his legal ownership – although she has significant rights over it.

The overall site is in places polluted, built up – without due consideration in places, and in need of planting.

SP5 Countryside

DEVELOPMENT IN THE COUNTRYSIDE (THAT IS, THAT AREA OF LAND LYING BEYOND THE SETTLEMENT BOUNDARIES SHOWN ON THE PROPOSALS MAP) WILL ONLY BE PERMITTED WHERE THE USE IS APPROPRIATE IN THE COUNTRYSIDE, RESPECTS AND ENHANCES THE LANDSCAPE CHARACTER AND BIODIVERSITY OF THE IMMEDIATE AND SURROUNDING AREA AND IS APPROPRIATE IN SCALE AND DESIGN.

PROPOSAL –

My client seeks to obtain Planning Consent for a Dwelling in Open Countryside. He has operated the site with Heavy Goods Vehicles for a considerable number of years. Newport City Council have submitted a Planning Application to site a Traveller Site on the same site and compulsory purchase his bungalow and land. The Council's application clearly states that this part of Open Countryside can be developed.

THE COUNCIL'S APPLICATION-

It is highly unlikely that the Traveller Site will be constructed on this site – it is simply unsuitable. Many of the vehicles on the site would require Waste Licences – and VOSA would not grant them.

PROPOSED POLICY SP5 IS TOO STRICT.

The proposed Policy SP5 is too strict. When assessing it's parameters, it becomes clear that there are sites which are, in Planning Terms, classed as Open Countryside; but have little resemblance to countryside. This site feels that it should be Open Countryside, but has been damaged and is being used for a reason that it should not be in such a location. The use is lawful.

Policy SP5 mentions respecting and enhancing the landscape, character and bio-diversity and development being appropriate in scale and design. The Council's proposal meets none of these criteria. SP5 is being proposed to prevent larger scale developments, as well as small developments taking place in Open Countryside – this is correct, however there are exceptions in cases of smaller developments.

Whilst it is understood that assessing on a microscopic level is difficult and time consuming, I hope that this application is considered on its full merits and is seen as an example where a caveat that makes SP5 more amenable to allow such sites as this site should be added.

PROPOSED ALTERATION TO POLICY-

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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It is suggested that Proposed Policy SP5 is either amended to allow for small sites to be added –

with strict conditions and strictly subject to each site's own merits OR

That an additional policy/paragraph is added to compliment SP5

SP5 Countryside

DEVELOPMENT IN THE COUNTRYSIDE (THAT IS, THAT AREA OF LAND LYING BEYOND THE SETTLEMENT BOUNDARIES SHOWN ON THE PROPOSALS MAP) WILL ONLY BE PERMITTED WHERE THE USE IS APPROPRIATE IN THE COUNTRYSIDE, RESPECTS AND ENHANCES THE LANDSCAPE CHARACTER AND BIODIVERSITY OF THE IMMEDIATE AND SURROUNDING AREA AND IS APPROPRIATE IN SCALE AND DESIGN.

Sustainable use of land - Objective 1

To ensure that all development makes the most efficient use of natural Resources by seeking to locate development in the most sustainable locations, Minimises the impact on the environment and makes a positive contribution to local communities. The site is currently part a large haulage yard – that does not suit the Planning Definition of the site.

Climate Change - Objective 2

To ensure that development and land uses in Newport make a positive contribution to helping to minimise the causes of climate change and to mitigating the impacts, by incorporating the principles of sustainable design, reducing the need to travel, providing safe and active travel routes, and managing the risks and consequences of flooding n/a

Economic Growth - Objective 3

To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region. n/a

Housing - Objective 4

To ensure that there is an adequate supply of land for housing in the most Sustainable locations, and to ensure that the quantity, quality and variety of Housing provision meets the needs of the population. Also to foster the Creation of places which contribute to local distinctiveness and thriving Communities.

The application seeks to provide a dwelling designed specifically for this site – it need not be large. It must suit the immediate environment/landscape.

Conservation and the Environment

Objective 5

To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the built environment. The dwelling will give the planners the opportunity to genuinely treat the overall site.

Objective 6

To protect and enhance the quality of the natural environment, including protected and non-protected species and habitats, regardless of Greenfield or Brownfield status, and also including the protection of controlled waters.

The proposed dwelling would transform the site into a pleasant addition to the area; as opposed to the Council's proposal.

Community Facilities and Infrastructure - Objective 7

To ensure the provision of appropriate new, and/or enhanced existing, community facilities.

The development is minor and will not allow for any new community provisions – visually it would improve the area. The Council proposal has triggered considerable opposition and street marches.

Culture and Accessibility - Objective 8

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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The principle that services and facilities should be sustainable and safely accessible to all regardless of culture, age, gender, and impairment is considered important to achieving sustainable development. Development proposals should therefore provide convenience and enjoyment of use for all and strive to enhance cultural identity.

To ensure that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals. The development will be fully disabled accessible.

I trust that this application will be viewed with the current planning application, and judged on its own merits, from a long term point of view. The planners are fully aware of the application and the site. The site did have a planning application refused some years ago – because of the Open Countryside policy. My client is extremely keen to achieve an approval on this site, but is aware of the current UDP Policy barrier.

I would like to add that having had conversations with the planners – they view this application as difficult because of it's planning history and Open Countryside Status. Policy SP5 should have flexibility to improve the Countryside – in cases such as this, and an additional paragraph should be added.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Yes
16	16	Subject to speak on at Examination SP5 specific to this site								
<i>Item Question</i>										
<i>Soundness Test</i>										
1	1	I think the LDP is sound.								No
<i>Item Question</i>										
<i>Tick-box reply</i>										
6	6	A new policy								Yes
8	8	Add a new site.								Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3200.D2//SP05	Friel, Ms Jenny	K W Dorrington Architectural Services		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.18

Policy: SP05

Summary: Policy SP5 is too restrictive and should allow for small sites to be added.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number SP5	
7	7	A new paragraph or new text.	Yes
14	14	Representation PROPOSED POLICY SP5 IS TOO STRICT. The proposed Policy SP5 is too strict. When assessing it's parameters, it becomes clear that there are sites which are, in Planning Terms, classed as Open Countryside; but have little resemblance to countryside. This site feels that it should be Open Countryside, but has been damaged and is being used for a reason that it should not be in such a location. The use is lawful. Policy SP5 mentions respecting and enhancing the landscape, character and bio-diversity and development being appropriate in scale and design. The Council's proposal meets none of these criteria. SP5 is being proposed to prevent larger scale developments, as well as small developments taking place in Open Countryside – this is correct, however there are exceptions in cases of smaller developments. Whilst it is understood that assessing on a microscopic level is difficult and time consuming, I hope that this application is considered on its full merits and is seen as an example where a caveat that makes SP5 more amenable to allow such sites as this site should be added. PROPOSED ALTERATION TO POLICY- It is suggested that Proposed Policy SP5 is either amended to allow for small sites to be added – with strict conditions and strictly subject to each site's own merits OR That an additional policy/paragraph is added to compliment SP5	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination SP5 specific to this site.	
<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	
1	1	I think the LDP is sound.	No
<i>Item</i>	<i>Question</i>		<i>Tick-box reply</i>
6	6	A new policy	Yes
8	8	Add a new site.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3201.D1//H15.01 C	Neale, Mr J C			29/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.71

Site: 428/ Pound Hill

Delete Site

Policy: H15.01 Coedkernew

Summary: Delete Gypsy and Traveller Transit Accommodation - Coedkernew from LDP

Item Question Representation Text

14 14 Representation

I write to you regarding the proposed gypsy travellers' site at Pound Hill. I understand this site is on a shortlist of five, having been chosen from a possible twenty sites.

I do not believe Pound Hill offers the best location, nor does it comply with WAG guidance as set out in the Draft Site Design Guidance. It is a steeply sloping site, which cannot be levelled and is in close proximity to the motorway, which is clearly advised against. I do not understand why this site has been deemed more suitable than others in the local area, i.e.: the old chicken farm in Marshfield, or Wyevale Garden Centre land.

The reason given for not advancing the chicken farm site is that it would increase vehicular activity on Marshfield Road. This judgment must severely restrict any other planning application on the site, as surely any future development will incur increased traffic. I will be interested to follow the future of the chicken farm. The judgement must also apply equally to the Pound Hill site, which is already traffic black spot.

The Wyevale Garden Centre land is deemed unsuitable as it is too large for purpose. Could the council not use a portion and resell the remaining land? Or would this be unworkable because the remaining land would be unsellable once a traveller site is built?

Both of these other sites seem far more suitable than Pound Hill in terms of benefit to the travellers themselves, so I can only conclude the council has settled on this option as they believe it will offer the least resistance, given that this is an emotive issue and Coedkernew has a much smaller population than Marshfield.

I understand this local development plan is open to consultation until May 28th. I have made my objection using the online form, but I do not find your form gives scope for detailed comment, hence my reason for sending this letter. Please would you advise me what provisions there will be for the local community to enter into the debate with council members before any final decision is made.

I would also like to understand what steps have been taken to ensure the wellbeing of residents near to the proposed sites in line with your statutory duty of care towards people affected by your undertakings. I would like to see the risk assessments related to this proposal.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3202.D1//H01	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E	O		M	

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 293/ Former South Wales Argus Site

New Site

Policy: H01

Summary: Add new site for residential development at Former South Wales Argus Site, Bideford Road.

Item Question Representation Text

3 3 Paragraph or section number(s)

See attached note

7 7 A new paragraph or new text.

Yes

14 14 Representation

Policy H1: Housing Sites

The former South Wales Argus site is not currently allocated for a specific use in the emerging Local Development Plan although it represents a coherent and logical development site. Our client considers this Site should be allocated for residential uses in the LDP – to provide certainty and clarity for both the LPA, local residents and the developer. The site specific reasons are set out below, in accordance with paragraph 9.2.9 of PPW:-

- Our client's site is a previously developed site and therefore offers a key urban regeneration opportunity.
- The Site has no incompatible neighbouring uses which may make the Site's development for housing unsuitable.
- The Site is located within walking distance of local facilities which include shops, a community hall, a primary school and a number of bus stops. The Site is therefore sustainable in its location, will help to reduce carbon emissions and will help to sustain local services and facilities.
- To our client's knowledge there are no infrastructure capacity issues which may prevent the Site being redeveloped for housing.
- The Site is not subject to any physical or environmental constraints relating to e.g. flooding, contamination, land stability issues etc, which may make the redevelopment of the Site for residential uses unsuitable.

In addition to the provisions set out in paragraph 9.2.9 of PPW, we confirm that although part of the site was utilised for printing newspapers this use ended some 3 years ago and the on-site buildings have remained derelict ever since. As part of the Site's wider redevelopment the remaining South Wales Argus offices will continue to operate from the adjacent Site and some of the income raised by the redevelopment is earmarked to help fund the refurbishment of the neighbouring South Wales Argus office and will therefore result in a benefit to this existing employment use. The LDP identifies an abundance of employment land and the the former South Wales Argus Site has failed to come forward for alternative employment uses since operations ceased over 3 years ago. The redevelopment of the wider Site for housing will help to refurbish and enhance the existing South Wales Argus offices. Unlike many of the new H1 allocated sites (10 or more dwellings), the former South Wales Argus site is available and deliverable in the short term providing an additional housing opportunity within the first phase of the plan period, 2011- 2016. This Site also benefits from being located within the urban area of Newport and therefore its redevelopment will deliver wider urban regeneration benefits. Furthermore the Site offers the opportunity to co-locate both housing and employment within the Site, which will help foster long-term sustainable travel-to-work patterns. On this basis, our client considers there is strong planning logic to support the redevelopment of the former South Wales Argus Site for housing and therefore it should be allocated as such in the Plan.

Required Change:

Allocation of the former South Wales Argus site for future residential development in the first phase (2011-2016) of the development plan. This will ensure the Plan is coherent in accordance with Soundness Test CE1, includes realistic allocations (Test CE2) and is reasonably flexible (Test CE4).

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

To ensure the identified issues are fully considered and discussed at examination.

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness									
	Required Change: Allocation of the former South Wales Argus site for future residential development in the first phase (2011-2016) of the development plan. This will ensure the Plan is coherent in accordance with Soundness Test CE1, includes realistic allocations (Test CE2) and is reasonably flexible (Test CE4).									
<i>Item Question</i>										
6 6	A new policy		Yes							
8 8	Add a new site.		Yes							

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3202.D2//Objectiv	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.9

Policy: Objective 1

Summary: Supports objective 1

Item	Question	Representation Text	Soundness Test	Tick-box reply
3	3	Paragraph or section number(s) See attached note		
7	7	A new paragraph or new text.		Yes
14	14	Representation Our client supports objectives 1, 3 and 4 which seek to locate development in the most sustainable locations particularly where this can also deliver the regeneration of appropriate previously developed sites. This ensures new development is located within areas that already offer existing infrastructure such as local services and public transport opportunities. Given that National Planning Policy contained in PPW promotes the reuse of previously developed land within the settlement boundary, it is important this approach is reflected where appropriate and viable in the emerging LDP. We concur with the provisions of objective 4 which seek to ensure there is an adequate supply of land for housing in the most sustainable locations and that this land supply should seek to deliver the quantity, quality and variety of housing provision that meets the needs of the population. As such the principle of developing the former South Wales Argus site for housing, which is an area of previously developed/underused urban land, accords directly with the LDP objectives. Its development will deliver environmental improvements as well as social and economic benefits. Allocation of the former South Wales Argus Site will also act to provide an element of choice and reasonable flexibility (as required by Soundness Test CE4) in the housing land supply. Unlike many of the allocated housing sites in the LDP, this is a new Site which has not been rolled forward from the previous UDP (see paragraph 2.38 of LDP) and is therefore a genuinely new Site.		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To ensure the identified issues are fully considered and discussed at examination.		
1	1	I think the LDP is sound.		Yes
13	13	Test of Soundness Revised Amendment: In response to the objectives, our client's site should be allocated for future residential development under Policy H1 in the first phase (2011-2016) of the development plan. This will ensure the Plan is sound on the basis of Test CE4 "it is reasonably flexible to enable it to deal with changing circumstances"		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3202.D3//Objectiv	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.10

Policy: Objective 3

Summary: Supports objective 3

Item	Question	Representation Text	Soundness Test	Tick-box reply
3	3	Paragraph or section number(s) See attached note.		
7	7	A new paragraph or new text.		Yes
14	14	Representation Our client supports objectives 1, 3 and 4 which seek to locate development in the most sustainable locations particularly where this can also deliver the regeneration of appropriate previously developed sites. This ensures new development is located within areas that already offer existing infrastructure such as local services and public transport opportunities. Given that National Planning Policy contained in PPW promotes the reuse of previously developed land within the settlement boundary, it is important this approach is reflected where appropriate and viable in the emerging LDP. We concur with the provisions of objective 4 which seek to ensure there is an adequate supply of land for housing in the most sustainable locations and that this land supply should seek to deliver the quantity, quality and variety of housing provision that meets the needs of the population. As such the principle of developing the former South Wales Argus site for housing, which is an area of previously developed/underused urban land, accords directly with the LDP objectives. Its development will deliver environmental improvements as well as social and economic benefits. Allocation of the former South Wales Argus Site will also act to provide an element of choice and reasonable flexibility (as required by Soundness Test CE4) in the housing land supply. Unlike many of the allocated housing sites in the LDP, this is a new Site which has not been rolled forward from the previous UDP (see paragraph 2.38 of LDP) and is therefore a genuinely new Site.		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To ensure the identified issues are fully considered and discussed at examination.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Revised Amendment: In response to the objectives, our client's site should be allocated for future residential development under Policy H1 in the first phase (2011-2016) of the development plan. This will ensure the Plan is sound on the basis of Test CE4 "it is reasonably flexible to enable it to deal with changing circumstances"		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3202.D4//Objectiv	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.10

Policy: Objective 4

Summary: Supports objective 4 of the LDP

Item	Question	Representation Text	Soundness Test	Tick-box reply
3	3	Paragraph or section number(s) See attached note		
7	7	A new paragraph or new text.		Yes
14	14	Representation Our client supports objectives 1, 3 and 4 which seek to locate development in the most sustainable locations particularly where this can also deliver the regeneration of appropriate previously developed sites. This ensures new development is located within areas that already offer existing infrastructure such as local services and public transport opportunities. Given that National Planning Policy contained in PPW promotes the reuse of previously developed land within the settlement boundary, it is important this approach is reflected where appropriate and viable in the emerging LDP. We concur with the provisions of objective 4 which seek to ensure there is an adequate supply of land for housing in the most sustainable locations and that this land supply should seek to deliver the quantity, quality and variety of housing provision that meets the needs of the population. As such the principle of developing the former South Wales Argus site for housing, which is an area of previously developed/underused urban land, accords directly with the LDP objectives. Its development will deliver environmental improvements as well as social and economic benefits. Allocation of the former South Wales Argus Site will also act to provide an element of choice and reasonable flexibility (as required by Soundness Test CE4) in the housing land supply. Unlike many of the allocated housing sites in the LDP, this is a new Site which has not been rolled forward from the previous UDP (see paragraph 2.38 of LDP) and is therefore a genuinely new Site.		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To ensure the identified issues are fully considered and discussed at examination.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Revised Amendment: In response to the objectives, our client's site should be allocated for future residential development under Policy H1 in the first phase (2011-2016) of the development plan. This will ensure the Plan is sound on the basis of Test CE4 "it is reasonably flexible to enable it to deal with changing circumstances"		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3202.D5//SP01	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Supports Policy SP1 of the LDP

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
3	3	Paragraph or section number(s) See attached note		
7	7	A new paragraph or new text.		Yes
14	14	Representation Our client supports policy SP1 which seeks to ensure development proposals will make a positive contribution to sustainable development. In particular, our client supports the continuation from the LDP objectives which seek to ensure previously developed land is prioritised against greenfield sites, in line with the provisions of PPW. In accordance with Policy SP1, the former South Wales Argus site is a previously developed site, located within the defined settlement boundary, therefore its development would be consistent with the approach set out in SP1 and would make efficient use of the land resource. In addition to this, the Site is surrounded by a mix of land uses including existing residential, retail and employment uses thereby minimising the overall need to travel. It is also located close to local facilities which include shops, a community hall, a primary school and a number of bus stops. The site is therefore sustainable in its location in line with this emerging policy. The former South Wales Argus site fully accords with the principles of Policy SP1 and therefore our client considers it is a logical housing site which should be allocated under Policy H1 (see representations to Policy H1 for further justification). The allocation of the Site would also ensure the Plan accords with Soundness Test CE1.		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To ensure the identified issues are fully considered and discussed at examination.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Revised Amendment: Allocate our client's site (under Policy H1) which should be recognised as a logical and sustainable residential development opportunity in Newport, which fully accords with the principles of Policy SP1 and requirements of Soundness Test CE1.		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3202.D6//SP10	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.21

Policy: SP10

Summary: Wants site allocated as housing site in order to ensure clarity.

Item Question Representation Text

3 3 Paragraph or section number(s)
See attached note

7 7 A new paragraph or new text. Yes

14 14 Representation
Emerging Policy SP10 sets out the dwellings which will be provided between 2011 and 2026. This Policy recognises windfall as one way in which housing can be delivered. Whilst our client recognises the important role windfall sites make in the delivery of housing, we wish to highlight that housing allocations provide an additional level of certainty and clarity (both for the developer, the LPA and local residents) which will aid housing delivery and ensure the Plan meets Soundness Test CE4 (flexibility) being reasonably flexible to deal with changing circumstances.

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination
To ensure the identified issues are fully considered and discussed at examination.

Item Question Soundness Test

1 1 I think the LDP is sound. Yes

13 13 Test of Soundness
Allocate our client's site (under Policy H1) which should be recognised as a logical and sustainable residential development opportunity in Newport making the Plan Sound on the basis of Tests CE4

Item Question

Tick-box reply

6 6 A new policy Yes

8 8 Add a new site. Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3202.D7//SP13	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.25

Policy: SP13

Summary: Questions the wording of Policy SP13

Item	Question	Representation Text	Soundness Test	Tick-box reply
3	3	Paragraph or section number(s) See attached note		
7	7	A new paragraph or new text.		Yes
14	14	Representation Emerging Policy SP13 states that development will be required to help deliver more sustainable communities by making contributions (via planning conditions, Section 106 and the Community Infrastructure Levy) to local and regional infrastructure in proportion to its scale and the sustainability of its location. Whilst our client agrees with the general principle of this policy, the wording of the policy and its supporting text is too ambiguous, inflexible and we question whether the policy wording accords with the tests set out in Welsh Office Circular 13/97 (Planning Obligations). Nowhere in the Policy or the supporting paragraphs is viability mentioned despite paragraph 2.51 re-emphasises the Local Development Plan's objective to prioritise the reuse of previously developed land - which is likely to yield more abnormal site costs and therefore result in viability challenges. Policy SP13 should therefore be re-worded to include a degree of flexibility – i.e. reference stating 'subject to viability'. This rewording should also be reflected in the supporting paragraphs to provide a degree of flexibility in order to ensure each development is assessed on a site by site basis. This change will ensure the Plan is sound in accordance with Test CE4 which requires the Plan to be reasonably flexible to enable it to deal with changing circumstances.		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To ensure the identified issues are fully considered and discussed at examination.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Amendment to Policy SP13 and supporting text to reference development viability. Proposals must be considered on a site by site basis to ensure development is not unnecessarily stifled and the Plan is reasonably flexible (in line with Test CE4).		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3202.D8//SP19	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.32

Policy: SP19

Summary: Supports criteria ii) of emerging Policy SP19

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
3	3	Paragraph or section number(s) See attached note		
7	7	A new paragraph or new text.		Yes
14	14	Representation Our client supports criteria ii) of emerging Policy SP19. Our client supports the provisions of this Policy which states that residential proposals which assist the regeneration of the urban area (see criteria ii) and reuse vacant, underused or derelict land (see criteria iii) should be particularly favoured.		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To ensure the identified issues are fully considered and discussed at examination.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness No required change		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3202.D9//H04	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.66

Policy: H04

Summary: Amendment to Policy H4 and supporting text to recognise viability and need for flexibility.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
3	3	Paragraph or section number(s) Amendment to Policy H4 and supporting text to recognise consideration of development viability and flexibility for development proposals.		
7	7	A new paragraph or new text.		Yes
14	14	Representation Emerging Policy H4, Affordable Housing, seeks to achieve a requirement of 30% affordable dwellings on residential development of 10 or more dwellings or of 0.33 hectares in the urban area. Paragraph 5.14 provides additional information on the details of the policy and provides reference to the 'Affordable Housing Supplementary Planning Guidance'. Although Paragraph 5.14 recognises that the supplementary document is there to provide detail on how the Council assesses scheme viability, the client believes that considerations relating to viability should be more explicitly imbedded within the wording of the policy – rather than being supplementary to the policy. This approach better reflects the pertinence of the viability issue for Newport, especially considering the LDP's emphasis on brownfield land (which is likely to result in more abnormal site costs) and also recognising the impacts from the recent economic recession. The need to consider viability, as well as adopt a flexible approach to affordable housing, in light of viability considerations should be more clearly written in to this Policy to ensure future development is not unduly stifled. These changes will ensure the Plan is reasonably flexible (Soundness Test CE4).		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination To ensure the identified issues are fully considered and discussed at examination.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Amendment to Policy H4 and supporting text to recognise consideration of development viability and flexibility for development proposals.		
6	6	A new policy		Yes
8	8	Add a new site.		Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3202.D10//EM03	Persimmon Homes (East Wales)	Nathaniel Lichfield & Partners		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.80

Policy: EM03

Summary: Amendment should be made to Policy EM3 so it explicitly considers any wide benefits which may be captured from permitting an alternative use on an employment sites.

Item Question Representation Text

3 3 Paragraph or section number(s)

Insertion of an additional criterion which considers the wider benefit yielded as a result of permitting an alternative use on part of a site. Amendment to criteria i) to include reference to (direct and indirect) employment level.

7 7 A new paragraph or new text.

Yes

14 14 Representation

Policy EM3 relates to alternative uses of employment land.

Whilst we acknowledge that part of the former South Wales Argus Site was utilised for printing newspapers, the printing of newspapers on-site ceased some 3 years ago and these buildings have remained derelict ever since. Despite this element of the business ceasing to be undertaken on-site, the South Wales Argus offices will continue to operate from the adjacent Site, with the remainder of the site being redeveloped for housing. In fact, some of the money raised by the redevelopment of the wider Site is earmarked to help fund the refurbishment of the neighbouring South Wales Argus office and will therefore result in a benefit to this existing employment use. In line with this, our client considers an amendment should be made to Policy EM3 so it explicitly considers any wider benefits which may be captured from permitting an alternative use on an employment sites e.g. in the case of our client's site enhancement and refurbishment of an existing employment premises and regeneration of a derelict urban site. This amendment better reflects the wider policy considerations and policy balances which need to be considered when considering alternative uses.

15 15 Do you want to speak at Public Examination?

Yes

16 16 Subject to speak on at Examination

To ensure the identified issues are fully considered and discussed at examination.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

Insertion of an additional criterion which considers the wider benefit yielded as a result of permitting an alternative use on part of a site. Amendment to criteria i) to include reference to (direct and indirect) employment level.

Item Question

Tick-box reply

6 6 A new policy

Yes

8 8 Add a new site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3204.D1/2.35-2.39/	Smith, Mr George	Derek Prosser Associates		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.21, para.2.35-2.39

Site: 305/ Land fronting A48 West of Parc Seymour

New Site

Policy: SP10

Map: Inset 14: Parc Seymour Village Boundary

Summary: To insert new site at Parc Seymour and notes an overall complacent attitude towards development that provides insufficient range and choice

Item Question Representation Text

2 2 Policy Number

SP10 (H1)

3 3 Paragraph or section number(s)

Paragraphs 2.35-2.39

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Please see attached sheet(s)

On behalf of my client, Mr George Smith, the owner of the land identified on the attached plans, I wish to point out that the Deposit Local Development Plan is unsound and needs to be changed.

The first of the Assembly Government's objectives for housing is:-

- "to provide more housing of the right type and offer more choice."

Furthermore, the Assembly Government will seek to ensure that:-

- "the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains, and, where possible enhances important landscape and wildlife features in the development."

As openly indicated in the Deposit Plan, the supply of housing is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permission for many years and seem no nearer to be developed now. There appears to be a complacent attitude that few more sites need to be allocated, even though the end date for the Plan is 2026. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

Also, national government emphasises the need to make up the shortfall in affordable housing provision.

The dependence on brownfield sites, where development costs are higher, is in danger of not producing the required affordable housing provision because of the threat to the viability of development.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites. It accepts that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Deposit Plan provides for its housing sites to be totally concentrated within the urban boundaries of the City with no opportunities beyond the urban boundaries. In particular there are no new allocations proposed to the east of The Coldra, within an extensive rural area which requires new development opportunities to sustain itself and the few rural village facilities.

The last published Joint Land Availability Study shows the City to have land available to provide a 3.5 year land supply when set against the UDP requirements. This will not have substantially improved with permissions granted since, when the next study is published shortly. It is suggested that, compared with the past 5 year build rates, the land supply equates to 6.4 years but the build rates were constrained by insufficient range of sites available for early development, depending so much on regeneration of brownfield sites. The Council's current Deposit Plan strategy is likely to suffer the same problems.

The Study showed that only 23.8% of the dwelling units were likely to be built within 5 years whereas over 73% would not become available until after the first 5 years.

National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. The Deposit Plan does little to address the short term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above-mentioned deficiencies. One such allocation would be that identified on the attached plan. It is well located on the A48 frontage adjoining an existing group of buildings with residential and commercial uses, but its development would not be prominently visible on land falling away from a rising frontage to the A48. The Coldra Roundabout has had major improvements to improve its capacity and further development east of The Coldra on the A48 will enhance the City's housing supply. There are good public transport links with Newport.

The land is an open field surrounded by established hedgerows and it is currently, and has been for some time, grazed by horses. As such it will have little ecological value but any important landscape and ecological features can be retained and enhanced in the development. Its allocation has the prospect of bringing forward early affordable housing provision as well as much needed choice and variety of housing sites.

National Government suggests a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the planning process to allow a faster lead-in time to development. The Deposit LDP proposals do little to provide a range of housing sites offering choice, variety and quality in the short term and flexibility to deal with changes in

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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circumstances. This site fronting the A48 will enhance the housing allocations and the development opportunities in Newport during the Plan period.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?							No	
<i>Item Question</i>										
1	1	I think the LDP is sound.							No	
<i>Soundness Test</i>										
13	13	Test of Soundness								
		C1, C2, C3, CE1, CE2, CE4								
<i>Item Question</i>										
8	8	Add a new site.							Yes	<i>Tick-box reply</i>

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3205.D1/5.31/H16.	Thomas Brothers	Derek Prosser Associates		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72, para.5.31

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to proposed Gypsy and Traveller site at Former Army Site, Pye Corner, Nash

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number H16 (iii)	
3	3	Paragraph or section number(s) 5.31	
4	4	The Proposals Map	Yes
11	11	Site Name Former Army Camp Site, Pye Corner, Nash	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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A more fully reasoned explanation will follow in a few days but for over one year the owner and agents have been preparing detailed studies and reports in conjunction with the requirements of Mike Southall planning officer, environment agency, CCW and others to prepare for a planning application for an anaerobic digester on a major part of the site. The application will shortly be ready for submission and should not be prejudiced by a proposal for a permanent gypsy and traveller site which has not been discussed directly with the landowners.

I refer to our telephone conversation on Friday (25th) and the representation I submitted yesterday (28th) by hand in response to the Deposit Plan policy/proposal H16. You will recall we discussed the prospect of the representation being just a holding representation while I prepare a more full explanation. You were agreeable to this because you had already agreed informal extensions of the consultation period with others and I thank you for this.

It is disappointing that the first we know of a Deposit Plan for my Client's site to be used for permanent Gypsy and Traveller Residential Accommodation, it through the formal document. My Clients had, I understand, been approached about access being made available for preliminary surveys to be carried out in conjunction with assessments of alternative sites, but I have been advised there was no feedback nor any approaches about the land being made available for such use.

Around late summer/early autumn last year a preliminary meeting was held with Mike Southall (Development Control) about the proposal for the development of a major part of the site for an anaerobic digester. The suggestion was made that approaches be made to E A Wales and CCW and this was arranged over the next few months. As a result, extensive survey and mitigation proposals work has been carried out with detailed reports commissioned at great expense on the subject of ecology, flood consequences, noise, odours and transport. A further meeting was held with Mike Southall in January, 2012, to advise on progress and develop his views on what else might be necessary for the submission. We have since prepared an Environmental Impact Assessment to accompany the application we propose submitting soon. I attach a copy of the Design and Access Statement we have prepared to submit with the application and this might be helpful in identifying the nature and scale of our proposals and the serious intent.

We therefore feel obliged to submit representations to confirm our view that the Plan is unsound because it includes policy/proposal H16(iii) which has not been discussed with the owners and would prejudice a proposal which would offer equal, if not greater community benefits.

When the application is submitted, it will fall to be considered under the UDP policies which have been taken into consideration in the pre-application discussions, preparations and formulation of the scheme. We trust that planning policy considerations will not be prejudiced by future aspirations and proposals in an emerging LDP. Your policy/proposals do raise important issues for my Clients and the progress of the LDP and I urge that you agree to an early meeting to discuss how we might address this situation of potential conflict.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
Especially if these objections are disregarded and a proposal for a scheme in accordance with N.G Policy is obstructed.			
To emphasis the merits of our alternative proposal.			

Item Question	Soundness Test	
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C1, C2, CE1, CE2, CE4	
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Item Question	Tick-box reply
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10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3205.D4/W1	Thomas Brothers	Derek Prosser Associates		31/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.113

Site: 312/ Pye Corner

New Site

Policy: W1

Summary: Allocate site for anaerobic digester at Pye Corner, Nash

Item Question Representation Text

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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1. INTRODUCTION

1.1. This Design and Access Statement is submitted in support of a full planning application for the construction of an anaerobic digester development with access and supporting works at Pye Comer, Nash. The application is also accompanied by an Environmental Assessment and this Statement should be read in conjunction with that Assessment.

1.2. This Statement is set out broadly in accordance with the requirements of Technical Advice Note 12: Design. Its contents have been noted and particular regard is had for Appendix 1 which gives guidance on the formulation of such a Statement.

2. LOCATION

2.1. This site is located approximately 6 kilometres to the south east of Newport's City Centre, in open countryside. It is about 300m east of Pye Comer alongside and to the south of Broad Street Common. It comprises part of a disused military camp site last used in the 1950s and located at the site of World War II defence gun emplacements. To the east and south are the remains of buildings with various concrete hardstandings. The site itself is an open field in rough grass, mostly surrounded by mature hedgerows. Between the site and Broad Street Common is a length of St Julian's Reen and a verge which is highway land.

2.2. The adjoining site to the east had the benefit of permission for use as an agricultural contracting depot until 13 December 2011, when it expired. The site owner will review the option as to whether to seek a new permission for the same development under similar policies in due course.

3. RENEWABLE ENERGY AND WASTE MANAGEMENT POLICY

3.1. Anaerobic digestion is recommended as the key technology to be utilized for disposal of food and organic wastes producing a source of renewable energy in the Waste Strategy for Wales, 2010; "Towards Zero Waste." The Renewable Energy Directive 2009 sets a target for the UK to achieve 15% of its energy consumption from renewable sources by 2020.

4. PLANNING POLICY CONTEXT

4.1. The Act requires that applications for planning permission should be determined in accordance with the approved or adopted development plan for the area unless material considerations indicate otherwise. The adopted development plan in this case is the Newport Unitary Development Plan 1996-2011, (UDP) adopted in May 2006. The Newport Local Development Plan is currently being formulated but is not sufficiently advanced to succeed the UDP at this stage and is unlikely to contain policies which contradict or differ greatly from UDP policies in respect of these proposals. It is important to note that the UDP policies were tested against Welsh Assembly Government policies and while these have been updated they are not significantly different from previous national policies in respect of countryside, Nature Conservation Interests and employment.

4.2. UDP policy SP6 restricts development in the countryside to circumstances where the use is appropriate in the countryside and it respects the character of the surrounding area and is appropriate in scale and design. It states the following:

"SP6 Development in the countryside (that is, that area of land lying beyond the settlement boundaries shown on the proposals map) will only be permitted where the use is appropriate in the countryside, respects the character of the surrounding area and is appropriate in scale and design."

4.3. The site falls within a designated Site of Special Scientific Interest and UDP policy CE6 seeks to protect nationally designated sites from development that would have an adverse impact upon the nature conservation interests of such sites. The policy states:

CE6 Development which would affect nationally designated site will only be permitted where:

i) the proposal would not have an adverse effect on the nature conservation interest of the site;

ii) the reasons for the development clearly outweigh the value of the site itself and its value in the network of such nature conservation sites, and it is possible to agree conditions for mitigation of harmful effects in consultation with the Countryside Council for Wales. "

4.4. UDP policy ED9 restricts the nature of employment development considered acceptable in principle in the countryside and contains development criteria against which such proposals will also be considered. It states:-

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"ED9 Employment development beyond the defined settlement boundaries will not be permitted unless:

- i) it relates directly to agriculture or forestry; or
- ii) it is for recreational, tourism, minerals or other activities for which a rural location is essential; or
- iii) it provides appropriate diversification of the rural economy; and
- iv) the location, scale and design of any proposed development takes account of its landscape setting and of any nearby buildings; and
- v) there is no unacceptably adverse impact on features of acknowledged historic, archaeological, nature conservation, or mineral resource interest; and
- vi) sterilisation of land within grades 1, 2, or 3a of the agricultural land classification is avoided; and
- vii) the development does not require the provision of unsightly infrastructure, and services can be readily and economically provided; and
- viii) any additional traffic can be accommodated on the existing road network; and
- ix) satisfactory access and parking can be provided. "

4.5Because of its association with the local farming activities and its need for a rural location, the proposal meets the policy requirements of policies SP6 and CE6. The use is appropriate in the countryside and this Design and Access Statement and supporting plans will show that the development respects the character of the surrounding area and is appropriate in scale and design. Discussions are advancing with Countryside Council for Wales (CCW) and Environment Agency Wales (EAW) and the resulting proposals will show that the development will not have an unacceptable adverse effect on the nature conservation interests of the site. An Extended Phase 1 Habitat Survey carried out by Gwent Ecology forms part of the Environment Assessment which supports the application.

4.6In response to the Council's policy ED9, the proposals do relate more than indirectly to agriculture and do embody activities and processes for which a rural location is essential. This Statement will show that the proposals also meet the other criteria set out in policy ED9.

5.THE PROPOSALS – A SUMMARY

5.1The Thomas Brothers (The Applicants) have an existing agriculture contracting business nearby and the development of the anaerobic digester will compliment and assist the business to expand and serve the local farming community. The digester has been designed to accommodate locally produced farm slurries, within a radius of approximately 25 miles, which the business has access to through the existing agricultural contracting connections. Legislation requires that farmers make provision for slurry storage on their land. However, most farmers do not want this expense and will use the facility at Nash to deal with the slurry on their behalf. It will also accommodate produced food waste.

5.2The development would comprise 2 buildings – one a substantial reception building rising to a maximum height of 8.4m – and a series of mainly interconnecting tanks and items of plant. A new access from Broad Street Common would be bridged over St Julian's Reen serving internal roads, manoeuvring areas and car parking. Also included would be concrete building, a surface water attenuation lagoon and a secondary bund in the form of a continuous landscaped bund to surround the development. All of this development would be contained within the open field and the surrounding hedgerows would be retained. A flood consequences assessment forming part of the Environmental Statement shows there is no need to raise site levels to accommodate the site development safely.

5.3In this location the development will import slurry from local farms. Such a facility will save local farmers money and space on their farms and it would benefit the community. Through the necessary Environmental Permit, and DEFRA licence proper checks and management practices would ensure safe storage and handling of the material. Commercial food waste would also be used with the slurry and produce a greater proportion of methane gas and therefore renewable electricity. This waste would be sourced locally therefore reducing disposal costs. Crops such as maize, already grown in the locality, could be used as energy crops with the slurry and food waste and digested to produce renewable energy, though such food crops will only be utilised should insufficient food waste be available. Renewable Energy and heat would be produced from the facility and up to 1MW of electricity could be produced from the site feeding green electricity into the national grid.

5.4It is envisaged the site will generate 10 Full-Time Equivalent jobs directly for local people. The Applicants have a good reputation as local employers and intend to recruit new staff locally to operate and manage the facility. Associated jobs would also be created or supported in the supply chain, eg mechanics and electricians, etc.

6.ENVIRONMENTAL SUSTAINABILITY

6.1The design vision for this site is the creation of a Welsh designed anaerobic digester which will be sympathetic to the local environment and serve the local community providing renewable energy in accordance with the national objectives referred to in paragraph 3.1.

6.2WAG planning policies in particular promote sustainability and alongside the UK Government, the Scottish Government and the Northern Ireland administration has agreed a set of shared principles

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intended to achieve the sustainable development purpose. Among these principles, identified in Planning Policy (PPW) at paragraph 4.1.5 is to:

•“achieve a sustainable economy: by setting out how we want to transform our economy so that it is low carbon, low waste.

One of the principles which underpins the WAG approach to planning policy for sustainable development (at 4.3.1) is:

•“applying the proximity principle, especially in managing waste and pollution. This means solving problems locally rather than passing them on to other places or future generations.”

6.3Normally commercial developments which employ local people would be encouraged to be located within urban areas, where there are opportunities to minimise the need to travel and increase accessibility by modes other than the private car. However, the nature of this use and its relationship with the farming activities of the locality require that it is sited in the rural area. The Applicants have strong business connections with local farmers and the immediately adjoining site until very recently has a full planning permission for an agricultural contracting depot. The distance travelled for the collection of slurry and energy crops is minimised with this rural location. The site is also within a relatively short distance of expansive employment areas and shops and services, though most journeys by employees are likely to be by car. There is a local bus service connecting to local villages and this passes Pye Corner though the service is not frequent. The relative proximity to the urban area will be of benefit in respect of the collection/delivery of food waste, which would be by road.

6.4The purpose of the development is to recycle and generate green energy. As a by product a liquid digestate, is produced from the facility, which is a high value fertilizer that will be of value to local farmers saving money and reducing the impact of artificial fertilizers. A solid cake is also produced which can be bagged and provided to local horticultural or domestic users as a solid improver.

6.5The Applicants acknowledge the importance of this location within the Gwent Levels SSSI and appropriate safeguards are being designed into development and the management of the facility. Ecological, landscape and geotechnical assessments have been made and incorporated in the Environmental Statement. As stated above, discussions are advancing with CCW and EAW and with appropriate feedback the sustainable objectives of the Welsh Assembly Government will be met. Existing hedgerows will be maintained, an inner protective bund will be constructed and a landscaped outer bund will provide additional ecological and landscape protection. The existing ditch adjacent to the hedge will be renovated to restore as a reen. This will be done in consultation with CCW and the Drainage Board.

6.6In all these respects referred to above, the Applicants consider that the proposals provide for a sustainable development.

7.CHARACTER/PROPOSALS

7.1While the site falls just to the south-east of the built up area of Newport in what might be termed as the urban fringe it is actually within Gwent Levels : Nash and Goldcliff SSSI. This is just one of the 6 units of SSSI in the Gwent Levels. The Levels area of flat low-lying land borders the Severn Estuary in 2 extensive tracts; - the Wentlooge Levels, extending between Cardiff and Newport; the Caldicot Levels, extending between Newport and Sudbrook Point. Historically, the land was reclaimed from the sea through the erection of sea walls and construction of drainage ditches.

7.2Today, the Levels are characterised by level open fields separated by a network of field ditches and linear hedgerows, reens and main reens. Because of the vast area the Levels, they are also interspersed with villages, farm complexes, groups of houses and even individual houses.

7.3As indicated above, the site is approximately 300m east of Pye Corner, alongside and to the south of Broad Street Common. It is an open field with, to the east, a group of derelict buildings which comprised a military camp last used in the 1950's and to the south remains of defence gun emplacements used during World War II. Both of these adjoining areas are partly overgrown with areas of dense vegetation. The application site however is a more open field bounded by mature field hedges with some linear depressions, which contain water during winter, and towards its northern border edge is a raised area of rumble and spoil. The site has a frontage to Broad Street Common but is separated from it by a width of verge which is highway land and a length of St Julian's Reen.

7.4The proposals have been developed out of the functional requirements of an anaerobic digester plant, with a strong recognition of the sensitivities of the landscape and ecology of the Levels SSSI.

7.5The site would be entered over a new simple bridge construction from Broad Street Common over St Julian's Reen. The first sight of the installation would be a water-tight bundgate then a weighbridge in the 7.00, wide roadway alongside which would be the portacabin site office building measuring 3.4 x 10.24m and 2.57, high of coloured coated steel, coloured mid-green with dark green roof. These would be set into the site behind a low landscape bund and wildlife pond which will provide water attenuation.

7.6The first process building encountered into the site would be 3 bay dry waste holding bunkers. These would be open fronted constructed of instu cast fine faced concrete (nature colour) rising to 5.15m with a raised open mono-pitched roof of mid-green profile metal sheeting rising from 6.15m to 8.4m.

7.7The largest building, set some 75 metres into the site and tucked relatively close to an existing mature hedge, is the reception building which receives the raw materials for the process. This is a steel frame building measuring 30m x 20m, 6.00, to eaves and a ridge height of 8.4m. The building elevations would be profile vertical sheeting coloured mid-green below colour coated profile roof

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sheeting coloured dark green with Polycarb safepan roof lights. The doors would be dark green pressed metal to match the roof with the roller shutter entrance also dark to match the roof. There would no window openings.

7.8The remainder of the installation, comprising various items of interconnected plant would be contained within a 300mm x 750mm high concrete bund wall to the east of the reception building. Immediately alongside the reception building would be a fully soundproofed power generating house, measuring and the front end waste and slurry holding tank measuring 3.00m x 9.00m and 3.2m high, constructed of pre-cast panels, natural colour with hinged galvanised steel lids finished in mid-green.

7.9Also contained within the concrete bund would be the following:-

i)Anaerobic Digester Tank, a circular tank of 13m diameter rising to a height of 10.61m with open access steps up one side and a platform across to the centre. The walls would be profile cladding in agricultural green and the enclosing roof while steel cladding. The steps would be self-coloured galvanised mild steel.

ii)Pasteurisation Tank, a circular tank of 8m diameter, rising to 6.3m and steps up one side. The walls would similarly be profile cladding in agricultural green and the roof white steel cladding. The stairs would be galvanised mild steel.

iii)The largest tank installation is the end production tank with a 23.00m diameter. The walls would be profile cladding in agricultural green and rise to 5.00m, and the double skin fabric roof would be mid-green, rising to a maximum height of 13.5m.

iv)The Liquid Separating Bunkers measure 5.6m x 1.90m and rise to 4.00, height. These are constructed of 300m insitu cast concrete walls, finished fair-faced and natural coloured.

All of these items of plant are interconnected with appropriate pipework and there would be space left for a further Anaerobic Digester Tank in the future if necessary.

7.10Also taking into account the functional requirements of the operation, the buildings and plant have been designed to reflect a group of farm buildings and supporting silos and plant in this rural location. The complex is set back from the road frontage and surrounded by the retained mature hedges which border the site. A low grassed bund would surround the whole installation providing a secondary defence to the local reens system and ecology through leakage. Landscaping would be kept to a minimum to reflect the open nature of the local landscape characterised by open fields enclosed by reens or mature hedgerows.

8.COMMUNITY SAFETY

8.1There would be only one way into the site from the highway and this is via a bridge over St Julian's Reen and through an entrance which is gated. The entrance will be controlled by a site office which will oversee all entries which will encounter a weigh bridge. Security will therefore be provided through natural surveillance.

8.2With a process such as the one proposed, particularly in such a sensitive location, safeguards will be necessary in respect of a number of aspects. Air quality is one such aspect and the system has been specifically designed to incorporate measures that avoid or minimise potential disturbance to local receptors through the diminishing of air quality. More details are contained in the Environmental Impact Assessment (EIA).

8.3The Applicants have acknowledged the sensitivities of the site which is low lying and within a Site of Special Scientific Interest. The site is within the designated Flood Zone C1. The area is served by significant flood defences and the Environmental Agency requires that developments within the area are supported by a Flood Risk Assessment (FCA). Such an assessment has been prepared and included in the EIA. It shows that the site would not be at risk of flooding nor would it cause risk of flooding elsewhere. The installation offers complete sealed liquid management systems which would not threaten the local drainage system and consequently safeguard the nature conservancy interests of the area.

8.4The proposed location of the development is sited as far from local residential receptors as possible. With appropriate mitigation measures, designed to the highest standard, the scheme will not cause harm to any environmental or amenity interests in the local area.

9.MOVEMENT/ACCESS

9.1The question of location in respect of access was considered by the appeal Inspector who considered the proposal for the establishment of an agricultural contracting depot on the immediately adjoining land to the east. In his decision dated 15/12/2004, the Inspector commented:-

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"In arriving at this decision, I have considered the Council's argument that the depot use in question should be located on an industrial estate and that such sites are available locally. However, I do not share this view. It is extremely unlikely in my view that the company would be able to compete with other potential uses or developers of such sites, given their wider development potential and value in commercial terms. Furthermore, it makes little sense to channel agricultural traffic, essentially servicing the surrounding rural community, into large urban areas, thereby increasing congestion and vehicular conflict in these areas. In my view the proposed site, which is just beyond the urban area and thus provides easy access to agricultural areas further away, is well located as an operating base for the use."

The proposed operation would have a similar relationship with the surrounding rural community and both offer and enjoy the same locational benefits.

9.2 Access would be gained by the creation of a new 7.00m wide roadway off Broad Street Common, running east-west across the north of the site. A new bridge will cross the St Julian's Reen and the wide verge, which is highway land, will provide excellent visibility in both directions. The road width has been designed to accommodate the likelihood of passing by heavy vehicles. The site gates are sited well into the site so there would be no obstruction to the highway by waiting traffic.

9.3 The site would be managed by 2 permanent members of staff. Both these people would be based on the site with movements in and out once each day, 6 days each week (Monday to Saturday). It is expected that staff will use cars for transport as the nearest bus service using Nash Road, several hundred yards away is infrequent. Staff will be encouraged to car share.

9.4 Farm slurry would be brought onto the site in agricultural tractor tankers. The numbers of movements would vary seasonally and be based upon the availability of other waste streams. It is however, estimated there would be 8 movements (4 in, 4 out) per day on average, 6 days per week. Each tanker would hold 10 tonnes of slurry. During spring and summer months there would be an increase in tractor trailer movements due to the movement of end product fertilizer to local farmers. (Approximately 10 movements into site of tractor and empty trailer and 10 movements out per day of full or part full tractor trailers.)

9.5 Food waste would be brought onto the site with 3 different vehicle types:-

- 7.5 tonnes box collection vehicle – up to 3.5 tonne capacity, 12 movements per day (6 in, 6 out)
- 23 tonne compactor collection vehicle up to 13 tonne capacity, 6 movements per day (3 in, 3 out)
- Articulated tankers 25 tonne – 15 tonne liquid food waste capacity, 2 movements per day (1 in, 1 out)

Actual vehicles used will depend on type of food waste. The wide internal road layout, generous manoeuvring area in front of the reception building, and 2 other turning areas within the site would ensure the efficient movement and turning of operational vehicles within the site.

9.6 The site is level and the internal road layout will be level providing good pedestrian accessibility between all parts of the roadway, parking and the operational buildings. Each of these buildings will be provided with ramped access to meet the appropriate part of the Building Regulations.

9.7 As indicated above, the distance travelled for the collection of slurry and energy drops is minimised with this rural location. The site is also within a relatively short distance (1-2 kilometres) of extensive employment areas, shops and services. There is a local bus service on Nash Road, connecting local villages with the built-up area but this service is infrequent.

10 CONCLUSION

10.1 The proposal is a well designed modern recycling operation which seeks to support national government objectives for the creation of renewable energy using waste products. Because of its close relationship with local agriculture as a source, it is ideally located in this urban fringe location. The design, implementation and operation of the installation will respect the character of the local landscape and in particular, pay regard to the sensitive setting of the SSSI. The Environmental Impact Assessment, which forms part of this submission, shows that there would be no harmful impacts upon the local environment.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

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<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.									
	Not Ticked									

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Document: Deposit Plan, p.62

Site: 327/ Cambrian Drive

New Site

Policy: H01

Map: Constraints Plan - West

Summary: Wants site allocated as housing site at Cambrian Close.

Item Question Representation Text

2 2 Policy Number

SP10 (H1)

5 5 Inset Plan(s)

Marshfield and castleton village area

Representation Details

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14	14	Representation								
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On behalf of my Clients, Mr and Mrs J Harris, the owners of the land shown in the attached plan, I wish to point out that the LDP is unsound and needs to be changed.

The first of the Assembly Governments objectives for housing is:-
"to provide more housing of the right type and offer more choice."

As openly indicated in the Plan the supply of housing land is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites, accepting that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Deposit Plan provides for its housing sites to be concentrated within the urban boundaries of the City with few opportunities beyond the City Boundaries. In particular there are no new allocations in Marshfield/Castleton. In fact, the village boundary has been drawn even tighter to exclude land which would have been available for minor development in the UDP.

The last published Joint Land Availability Study shows the City to have land available to provide a 3.5 year land supply available when set against the UDP requirements. This will not have substantially improved with the permissions granted since, when the next study is published shortly. It is suggested that compared with the past 5 year build rates, the land equates to 6.4 years supply, but the build rates were constrained by insufficient range of sites available for immediate development.

The Land Availability Study showed that only 23.8% of the dwelling units available were likely to be built in the first 5 years whereas over 73% would not become available until after the first 5 years.

National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. This Deposit Plan does little to address the short-term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above-mentioned deficiencies. One such allocation would be that identified in the attached plan at Marshfield. The villages of Marshfield/Castleton are sited between Newport and Cardiff where there is a high demand for new housing. This has been obvious with the take-up of new housing over the past 2 decades. The villages have a reasonable local infrastructure which itself needs to be sustained. In addition there are reasonable public transport links with Newport and Cardiff.

National Government suggests a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the Planning Process to allow a faster lead-in time to development. The Deposit Plan proposals do little to provide a range of housing sites offering variety, quality and choice in the short-term. This site in Marshfield is modest in scale and ideally located in relation to some of the most recent village development, its amenities and services. It would form a natural rounding off for housing purposes.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	No
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<i>Item Question</i>	<i>Soundness Test</i>	
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C1, C2, C3, CE1, CE2, CE4
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<i>Item Question</i>	<i>Tick-box reply</i>
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8	8	Add a new site.	Yes
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3206.D2//SP10	Harris, Mr & Mrs J	Derek Prosser Associates		28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.21

Policy: SP10

Map: Constraints Plan - West

Summary: Wants site allocated as housing site

Item Question Representation Text

2 2 Policy Number

SP10 (H1)

5 5 Inset Plan(s)

Marshfield and Castleton village area.

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14 14 Representation

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The first of the Assembly Governments objectives for housing is:-
"to provide more housing of the right type and offer more choice."

As openly indicated in the Plan the supply of housing land is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites, accepting that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Deposit Plan provides for its housing sites to be concentrated within the urban boundaries of the City with few opportunities beyond the City Boundaries. In particular there are no new allocations in Marshfield/Castleton. In fact, the village boundary has been drawn even tighter to exclude land which would have been available for minor development in the UDP.

The last published Joint Land Availability Study shows the City to have land available to provide a 3.5 year land supply available when set against the UDP requirements. This will not have substantially improved with the permissions granted since, when the next study is published shortly. It is suggested that compared with the past 5 year build rates, the land equates to 6.4 years supply, but the build rates were constrained by insufficient range of sites available for immediate development.

The Land Availability Study showed that only 23.8% of the dwelling units available were likely to be built in the first 5 years whereas over 73% would not become available until after the first 5 years.

National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. This Deposit Plan does little to address the short-term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above-mentioned deficiencies. One such allocation would be that identified in the attached plan at Marshfield. The villages of Marshfield/Castleton are sited between Newport and Cardiff where there is a high demand for new housing. This has been obvious with the take-up of new housing over the past 2 decades. The villages have a reasonable local infrastructure which itself needs to be sustained. In addition there are reasonable public transport links with Newport and Cardiff.

National Government suggests a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the Planning Process to allow a faster lead-in time to development. The Deposit Plan proposals do little to provide a range of housing sites offering variety, quality and choice in the short-term. This site in Marshfield is modest in scale and ideally located in relation to some of the most recent village development, its amenities and services. It would form a natural rounding off for housing purposes.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Yes

13 13 Test of Soundness
C1, C2, C3, CE1, CE2, CE4

Item Question

Tick-box reply

8 8 Add a new site.

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3207.D1//H16.02	Carter, Ms Angharad			28/05/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Map: Constraints Plan - East

Summary: Objects to inclusion Gypsy and Traveller Residential Accommodation - Former Army Barracks, Pye Corner, Nash, in deposit LDP

Item Question Representation Text

14 14 Representation

The principal reasons for my objection to these proposed developments are as follows:

1. Welsh Government guidelines state a development of this type should not occur on a flood plain.
2. The two proposed sites on Broad Street Common are in the middle of Sites of Special Scientific Interest or on the edge of one.
3. The two sites on Broad Street Common are within the rural area and outside the environs of the village; such development would have an adverse impact on the rural landscape.
4. The sites in Broad Street Common are adjacent to deep reens which pose a drowning danger to gypsy children.
5. Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans and house more than 100 travellers. There are only just over 200 electors shown on the electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village and there is no mains sewerage in parts of the village - this proposal therefore is conflicting with policies that the council have been adhering to for several years.

I have only recently moved to the Nash area however I would be deeply disappointed if this proposal were to be sanctioned. I fail to see how an area that is inclusive of SSSI's and an abundance of natural wildlife can be considered for such developments. In addition to this I fear for the safety of travellers who might settle on these sites given the proximity to the deep reens and also to the traffic - there is a high volume of traffic travelling along Broad Street Common during peak times at a frighteningly high speed. Most importantly I am concerned that the high volumes of waste and litter associated with such developments will be the demise of such a wonderful and natural area in Newport. We have already witnessed the negative impact traveller sites can have upon the local environment with 3 illegal sites having being established on Meadows Road, Nash in as many months.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3207.D2//H16.03	Carter, Ms Angharad			28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objects to inclusion of Gypsy and Traveller Residential Accommodation - Former Army Camp Site, Pye Corner, Nash in deposit LDP

Item Question Representation Text

14 14 Representation

The principal reasons for my objection to these proposed developments are as follows:

1. Welsh Government guidelines state a development of this type should not occur on a flood plain.
2. The two proposed sites on Broad Street Common are in the middle of Sites of Special Scientific Interest or on the edge of one.
3. The two sites on Broad Street Common are within the rural area and outside the environs of the village; such development would have an adverse impact on the rural landscape.
4. The sites in Broad Street Common are adjacent to deep reens which pose a drowning danger to gypsy children.
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6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village and there is no mains sewerage in parts of the village - this proposal therefore is conflicting with policies that the council have been adhering to for several years.

I have only recently moved to the Nash area however I would be deeply disappointed if this proposal were to be sanctioned. I fail to see how an area that is inclusive of SSSI's and an abundance of natural wildlife can be considered for such developments. In addition to this I fear for the safety of travellers who might settle on these sites given the proximity to the deep reens and also to the traffic - there is a high volume of traffic travelling along Broad Street Common during peak times at a frighteningly high speed. Most importantly I am concerned that the high volumes of waste and litter associated with such developments will be the demise of such a wonderful and natural area in Newport. We have already witnessed the negative impact traveller sites can have upon the local environment with 3 illegal sites having being established on Meadows Road, Nash in as many months.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3207.D3//H15	Carter, Ms Angharad			28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.71

Policy: H15

Summary: Objects to Gypsy and Traveller sites in Broadstreet Common

Item Question Representation Text

14 14 Representation

The principal reasons for my objection to these proposed developments are as follows:

1. Welsh Government guidelines state a development of this type should not occur on a flood plain.
2. The two proposed sites on Broad Street Common are in the middle of Sites of Special Scientific Interest or on the edge of one.
3. The two sites on Broad Street Common are within the rural area and outside the environs of the village; such development would have an adverse impact on the rural landscape.
4. The sites in Broad Street Common are adjacent to deep reens which pose a drowning danger to gypsy children.
5. Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans and house more than 100 travellers. There are only just over 200 electors shown on the electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village and there is no mains sewerage in parts of the village - this proposal therefore is conflicting with policies that the council have been adhering to for several years.

I have only recently moved to the Nash area however I would be deeply disappointed if this proposal were to be sanctioned. I fail to see how an area that is inclusive of SSSI's and an abundance of natural wildlife can be considered for such developments. In addition to this I fear for the safety of travellers who might settle on these sites given the proximity to the deep reens and also to the traffic - there is a high volume of traffic travelling along Broad Street Common during peak times at a frighteningly high speed. Most importantly I am concerned that the high volumes of waste and litter associated with such developments will be the demise of such a wonderful and natural area in Newport. We have already witnessed the negative impact traveller sites can have upon the local environment with 3 illegal sites having being established on Meadows Road, Nash in as many months.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3207.D4//H17	Carter, Ms Angharad			28/05/2012	<input type="checkbox"/>	P			M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objects to Gypsy and Traveller sites at Broadstreet Common

Item Question Representation Text

14 14 Representation

The principal reasons for my objection to these proposed developments are as follows:

1. Welsh Government guidelines state a development of this type should not occur on a flood plain.
2. The two proposed sites on Broad Street Common are in the middle of Sites of Special Scientific Interest or on the edge of one.
3. The two sites on Broad Street Common are within the rural area and outside the environs of the village; such development would have an adverse impact on the rural landscape.
4. The sites in Broad Street Common are adjacent to deep reens which pose a drowning danger to gypsy children.
5. Welsh Government guidelines state that sites should respect the scale of and not be so large as to dominate the nearest settled community and should avoid placing an undue burden on the local infrastructure. One of these sites alone could include around 40 caravans and house more than 100 travellers. There are only just over 200 electors shown on the electoral Register for Nash Village.
6. Residents of Nash have been refused planning permission for any new builds for many years because of Newport City Council's policy of not allowing development within the flood plain or outside the environs of the village and there is no mains sewerage in parts of the village - this proposal therefore is conflicting with policies that the council have been adhering to for several years.

I have only recently moved to the Nash area however I would be deeply disappointed if this proposal were to be sanctioned. I fail to see how an area that is inclusive of SSSI's and an abundance of natural wildlife can be considered for such developments. In addition to this I fear for the safety of travellers who might settle on these sites given the proximity to the deep reens and also to the traffic - there is a high volume of traffic travelling along Broad Street Common during peak times at a frighteningly high speed. Most importantly I am concerned that the high volumes of waste and litter associated with such developments will be the demise of such a wonderful and natural area in Newport. We have already witnessed the negative impact traveller sites can have upon the local environment with 3 illegal sites having being established on Meadows Road, Nash in as many months.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3208.D1/2.29, 4.2,	Morgan, Mr & Mrs P	Derek Prosser Associates		28/05/2012	<input type="checkbox"/>	P	O		M	
Document: Deposit Plan, p.19, para.2.29, 4.2, 4.7		Site: 134/2076.C1 Sneyd Lodge/Park		Boundary Change						
Policy: SP07		Map: Proposals Plan - West								
Summary: Area at Sneyd Lodge should not be designated as Green Wedge										

Item Question Representation Text

2 2 Policy Number
SP7 (CE2 & CE5)

3 3 Paragraph or section number(s)
2.29, 4.2, 4.7

4 4 The Proposals Map

Yes

9 9 Amend the boundaries of an existing site.

Yes

12 12 Site Reference
1608/1455

14 14 Representation

The Plan should be amended by the deletion of the area shown on the attached plan, from the proposed Green Wedge and, that part which is designated as Environmental Space should not be so designated.

The purpose of Green Wedges is to prevent

the coalescence of settlements, to control the expansion of urban areas and to safeguard the countryside from encroachment. This particular area of the proposed Green Wedge has very limited width and a tenuous width of link with the wider Green Wedge north of Bedwas, because of its proximity to the administrative boundary of Torfaen CBC. Immediately north of the boundary are the extensive grounds of Rougemont School which, despite being within Torfaen's own Green Wedge (Green Space), has been allowed to expand with major developments during the past decade. The Schools location in this position is clearly because of its proximity to the built up area of Malpas and the (Torfaen) Council's decision to allow its major expansion will just as clearly be because of its perception as part of Newport's built-up area. It is certainly not because it is an open green area which separates Newport from Cwmbran.

Additionally, the site is not an open area and its modest development with a few houses would not threaten the coalescence of Newport and Cwmbran because it already has development at its frontage to Malpas Road, echoing residential development on the other side of Malpas Road, and immediately to its north, also fronting Malpas Road, is the substantial urban development of Rougemont School.

It is noticeable that the extensive open school grounds to the adjoining School to the south of the Sneyd Park land and having an open frontage to Malpas Road, are not included in the Green Wedge. If the designation is to have any credibility and consistency, it should either include the school playing fields or it should exclude the Sneyd Park land referred to in the plan attached. For the reasons expressed above, the Sneyd Park land should be excluded from the designation.

The land designated as an Environmental Space is not appropriate for inclusion as such a designation. In paragraph 4.7 of the Written Statement, the Council suggests that Environmental Spaces provide a network of connected accessible, multi-functional sites that can bring about multiple social, health, economic and environmental benefits to the area. This is an isolated designation, it is not connected or accessible, nor is it multi-function from the point of view that it is privately owned land to the rear of a number of private houses. If it has environmental and ecological value, this can be retained through normal development control processes.

Additional Information Submitted - Available on Request

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		No							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness									
	C1, C2, C3, CE1, CE1, CE4									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3208.D2//CE05	Morgan, Mr & Mrs P	Derek Prosser Associates		29/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.49

Site: 369/ Sneyd Lodge

Boundary
Change

Policy: CE05

Summary: Remove land at Sneyd Lodge from the Environmental Space designation

Item	Question	Representation Text	Yes
2	2	Policy Number SP7 (CE2 & CE5)	
3	3	Paragraph or section number(s) 2.29, 4.2, 4.7	
4	4	The Proposals Map	Yes
9	9	Amend the boundaries of an existing site.	Yes
12	12	Site Reference 1608/1455	
14	14	Representation The Plan should be amended by the deletion of the area shown on the attached plan, from the proposed Green Wedge and, that part which is designated as Environmental Space should not be so designated. The purpose of Green Wedges is to prevent the coalescence of settlements, to control the expansion of urban areas and to safeguard the countryside from encroachment. This particular area of the proposed Green Wedge has very limited width and a tenuous width of link with the wider Green Wedge north of Bedwas, because of its proximity to the administrative boundary of Torfaen CBC. Immediately north of the boundary are the extensive grounds of Rougemont School which, despite being within Torfaen's own Green Wedge (Green Space), has been allowed to expand with major developments during the past decade. The Schools location in this position is clearly because of its proximity to the built up area of Malpas and the (Torfaen) Council's decision to allow its major expansion will just as clearly be because of its perception as part of Newport's built-up area. It is certainly not because it is an open green area which separates Newport from Cwmbran. Additionally, the site is not an open area and its modest development with a few houses would not threaten the coalescence of Newport and Cwmbran because it already has development at its frontage to Malpas Road, echoing residential development on the other side of Malpas Road, and immediately to its north, also fronting Malpas Road, is the substantial urban development of Rougemont School. It is noticeable that the extensive open school grounds to the adjoining School to the south of the Sneyd Park land and having an open frontage to Malpas Road, are not included in the Green Wedge. If the designation is to have any credibility and consistency, it should either include the school playing fields or it should exclude the Sneyd Park land referred to in the plan attached. For the reasons expressed above, the Sneyd Park land should be excluded from the designation. The land designated as an Environmental Space is not appropriate for inclusion as such a designation. In paragraph 4.7 of the Written Statement, the Council suggests that Environmental Spaces provide a network of connected accessible, multi-functional sites that can bring about multiple social, health, economic and environmental benefits to the area. This is an isolated designation, it is not connected or accessible, nor is it multi-function from the point of view that it is privately owned land to the rear of a number of private houses. If it has environmental and ecological value, this can be retained through normal development control processes. Additional Information Submitted - Available on Request	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		No							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		No							
13 13	Test of Soundness									
	C1, C2, C3, CE1, CE2, CE4									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3209.D1//H01.54	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.64

Site: 102/1562.C1 Alcan Factory

Policy: H01.54

Map: Constraints Plan - East

Summary: Supports allocation of Former Alcan Site

Item Question Representation Text

2 2 Policy Number

H1

4 4 The Proposals Map

Proposals Map East

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

Newport LDP Deposit – Representations on behalf of the Walters Land (Rogerstone) Limited Land at the former Alcan site and related policies

Savills is instructed by Walters Land (Rogerstone) Limited (hereafter referred to as Walters) to make representations in respect of the Newport Deposit LDP (hereafter referred to as the DLDP) This letter summarises the representations concerning policies relating to or which could affect the redevelopment of the former Alcan site at Rogerstone, also referred to within the plan as the Novellis site.

The letter should be read in conjunction with the representation forms, which are enclosed. The letter has been prepared to help the Council understand the position that has been reached with proposals for the regeneration of the site. It begins with a summary of the substantial progress that Walters has made since completing the site's purchase in March this year. There is significant alignment between Walters' ambitions for the site and the contents of the DLDP and, on this basis, much of what we say about the content of the DLDP is positive and supportive. However, there are some areas of the plan that we consider can and should be improved. This letter provides essential context, which explains the rationale behind our comments (which are contained on the individual representation forms and summarised in this letter).

Background – Walters Basic Position

The site presents a major regeneration opportunity. It was previously the location of a large aluminium plant, which closed in April 2009. Since then it has been largely cleared of buildings in preparation for reclamation and redevelopment. As stated above, the whole site has recently been acquired by Walters who is committed to delivering regeneration of the site within the plan period and in the short term.

As well as being previously developed land, the site also occupies an accessible and strategic location. The site can be reached by bus and car, a number of facilities lie in the adjacent urban area (within walking distance) and Rogerstone railway station is not far from the site. Walters is also confident (for the reasons set out in this letter) that comprehensive redevelopment can be delivered within the plan period. Walters already knows a lot about the site having undertaken preliminary assessments as part of its due diligence investigations before purchasing the site. Since then a team of consultants has been appointed to advise on the characteristics and conditions of the site and on the opportunities it presents. These include experts on flood risk, ground conditions, highways, landscape, archaeology and ecology. A master plan team has also been commissioned and will shortly produce a basic development concept for the site.

Together with an abundant supply of better employment land and a clear requirement for new homes (and an accepted sequence that sees previously developed land used before further Greenfields are released), these credentials make the site an ideal location for new housing. There are few other deliverable opportunities which see so much land recycled and transformed in such an accessible location.

On this basis, Walters is delighted to see the site identified for redevelopment in the DLDP. This comes in two places – in Policy H1(54), which allocates the former Alcan site for 700 dwellings and a primary school and in Policy EM2 which allocates the site for a variety of commercial and business uses. Walters' view is however that the site should only be allocated for housing (to avoid potential confusion) and that the 700 figure should not be treated as an upper limit for the amount of housing that can be achieved on the site. The reasons for these statements go to the progress that Walters has made with the site and the programme it has for its redevelopment. This is summarised below:

Site Condition and Programme for Development and Appointment of Consultants

As stated already, a team of consultants have been appointed to advise on the technical aspects that the site presents, including flood risk, ground conditions, highways and ecology. A master plan team has been appointed and early engagement with the development management department at the Council has taken place.

In summary, and at this stage, the following has been established:

- Ecology, Landscape and Archaeology – EDP has been appointed to deal with these matters and given the seasonal dependency its initial focus has been on ecology. EDP has liaising with the council ecologist, who is aware of the ecological work being undertaken on site this year. This extends to all protected species to ensure that there is no constraint to development, or that any important features can be worked into the masterplan at this stage. The survey work carried out to date shows that whilst large areas of the site have very little value (and the potential for improvement), there are some interesting parts. No substantial constraints have, however, been recorded. The survey work will continue on the site until firm conclusions can be made.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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- Flood risk – The TAN 15 (Development and Flood Risk) Development Advice Maps (DAMs) identify that the northern two thirds of the site is located within Zone C1 with the southern third falling within Zone C2. Arup has been appointed to deal with flood risk and has had discussions with the Environment Agency (EA). The initial flood risk modelling results from Arup are encouraging and show that the entire site is free from 100 year flood event - the modelling assessments are on going. Its proposed work includes:

- oInspecting the existing flood defences and advising on the need for strengthening or improvement works
- oObtaining the flood model for the River Ebbw from the EA to undertake complete hydrological analysis in the vicinity of the site followed by running the model for existing conditions with the existing flood defences, and proposed conditions with the defences strengthened and/or raised
- oLiaising with the EA and submit a flooding report for approval
- oUndertaking a Flood Consequences Assessment for the proposed development
- oLiaising with the design team to coordinate the location of any onsite flood compensation if required and agree options for onsite attenuation

- Ground conditions – Integral Geotechnique has been appointed to deal with work relating to ground conditions and remediation. The site was formerly used for the manufacture of processed aluminium products. The assessment will, therefore, focus on the potential for contamination on the site, possible pathways and sensitive receptors. Extensive site investigation work has already been undertaken for the site, which will form the basis of the proposed remediation/reclamation strategy.

- Highways and Transport – Arup has been appointed to prepare a Transport Assessment (TA) for the proposed development. A Transport Assessment Scoping Report has been prepared and discussed with Newport City Council. This sets out the methodology and assumptions that will be used in a detailed TA. Following a review of the transport principles underpinning the development proposal, a number of key working assumptions have been identified. These have been outlined in the scoping report to provide a basis for agreeing an approach to assessment with NCC.

A preliminary master planning exercise has also taken place in order to understand site constraints and capacity. This has adopted a rigorous approach to site conditions and urban design influences and has defined a series of core principles together with a vision for the new neighbourhood that will transform the site. This is work in progress and cannot be shared at this time. However, early indications are that the site can accommodate a greater level of housing than that identified in the DLDP. Depending upon the detailed master planning, it is possible that site could accommodate between 700 and 1,200 dwellings and it is this level of development that is currently being tested by Walters' consultant team.

With respect to programme, Walters plan is ambitious but realistic. An application is currently being prepared for outline planning permission and discussions are already underway with the Council. Walters' team has concluded that Environmental Impact Assessment (EIA) will be required and an application for a scoping opinion (to confirm which issues the assessment should focus on) will be made shortly. The current programme for the submission of an application is late summer/early autumn. Given the brownfield status of the site, its lack of any allocations for specific uses within the current UDP and its inclusion within an existing settlement boundary, there should be no existing planning policy obstacle to allowing residential development on the site. As a consequence, the site is one which Walters are confident can deliver a significant level of housing entirely within the plan period.

Together with the developing a picture of site condition and capacity, this also reflects Walters experience in regeneration and redevelopment. Walters Land Limited (WLL) is a land development company specialising in the identification, purchase, remediation and preparation of brownfield sites for development. This includes sites with complex ground conditions and other constraints. WLL uses the complementary resources of the other Walters Group companies to carry out the remediation works. Their vast experience and the resources available for reclaiming and remediating sites and preparing them for development ensures that each site can be delivered in a relatively short period of time.

Examples of projects include the £35 million Castlegate Development, Caerphilly. The project involved remediating and developing a 60 acre heavily contaminated site for a mixture of housing and commercial development. Other examples include Prospect Place in Cardiff Bay, Bryngwyn Steel Works in Swansea and the former Spontex Works at Swansea Point. The level of investment and work involved in each of these projects should demonstrate to the Council that Walters has the reputation to deliver and can be confident that the redevelopment of the former Novelis site will be delivered during the plan period.

Walters' experience also reinforces the concern that the DLDP may currently underestimate the contribution that the site can make to the plan's requirements. As a result and as stated before, whilst support is given for the application under Policy H1(54), it is important to note that the preliminary master planning exercise indicates that the site could accommodate significantly higher housing numbers than the 700 indicated within the DLDP. It is, therefore, suggested that the policy wording be revised in order to make it clear that the allocations for each of the sites allocated for residential development are indicative and, should the sites come forward for development with higher numbers, this would not be opposed.

In this context the following key representations are made to the DLDP.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Support and Objection: H1(53) H1(56) and H1(57) – Housing

The allocation for residential development under H1(53) is fully supported. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,000 new homes on the site should be targeted, or it should be made clear that the 700 figure is not an upper limit.

For the reasons described above, we object to the allocations at H1(56) or H1(57) or recommend that they are included as reserve sites only (to be called on should the other sequentially preferable sites fail in any way).

Objection – Requirement to prioritise previously developed land for new housing

The allocation of new sites for residential development is predominantly weighted towards previously developed, or brownfield, sites in terms of site area and numbers. There are however allocations for new Greenfield developments. Given the priority of previously developed land in preference to Greenfield sites, as set out within PPW and Strategic Policy SP1 of the DLDP, it would be appropriate to include a phasing policy within the housing chapter, which requires that allocations for previously developed sites come forward in advance of Greenfield sites. This would particularly assist regeneration sites, such as the Novelis, as well as numerous other brownfield sites in the area.

Summary and Conclusions

As we said at the start of this letter, and for obvious reasons, there is a lot to support in the DLDP. These representations welcome the allocation made for the Novelis site and, even at this early stage, should provide the Council with the confidence that the site can and will deliver development proposed under Policy H1(54). The control of the site by a single, land development company which specialises in making sites like this ready for development by housebuilders, together with the commitment Walters has made to make a planning application and secure redevelopment of the site, underscores the prospects of delivery early in the plan period.

Preliminary meetings have already taken place with the Council's planning department with a view to informing the planning application. The feedback, as far as being positive with regard to the principles of development, has helped to inform the technical appraisals, which are under way. The programme for the submission of a planning application is for late summer/early autumn 2012.

There are places where the plan can be improved, and three key changes are recommended. The first is that early (but thorough) assessments of the site its potential indicates that the site can accommodate higher levels of housing than the DLDP currently indicates. As a consequence, whilst supporting the basic allocation, the DLDP needs to recognise that more housing can be delivered from the site or that the figure currently used is not an upper limit.

The second is the need to ensure that previously developed sites come first. This can be easily achieved through the deletion of the new Greenfield sites (which are not needed to meet the requirements the plan aims to accommodate). Alternatively more emphasis can be given to a sequence that starts with previously developed sites or which postpones or reserves any new Greenfield sites until the later stages of the plan period.

The third is the deletion of the site from Policy EM2, which we believe is unnecessary, given the site's housing allocation under Policy H1 and the clear potential it has to provide a substantial number of new homes. Other objections are raised in relation to general development control policies and in order to ensure that the provision of school places in relation to the development is commensurate with the development that is to be provided on site.

None of these changes threaten the integrity of what we see as a generally very good plan – we just think it could be better, more sustainable and more accurate in terms of the sites it relies on and the sequence it follows.

15 15 Do you want to speak at Public Examination?

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
<p>The allocation for residential development under H1(54) is fully supported. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,000 new homes on the site should be targeted, or it should be made clear that the 700 figure is not an upper limit.</p>										
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.								No	
13 13	Test of Soundness									
<p>See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4</p>										
<i>Item Question</i>									<i>Tick-box reply</i>	
6 6	A new policy								Yes	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3209.D2//H01.56	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.64

Site: 425/ Woodland Site

Delete Site

Policy: H01.56

Map: Constraints Plan - East

Summary: Object to inclusion of housing allocation at Woodlands Site, Ringland

Item Question Representation Text

2 2 Policy Number
H1

4 4 The Proposals Map
Proposals Map East

14 14 Representation
Support and Objection: H1(53) H1(56) and H1(57) – Housing

The allocation for residential development under H1(53) is fully supported. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,000 new homes on the site should be targeted, or it should be made clear that the 700 figure is not an upper limit.

For the reasons described above, we object to the allocations at H1(56) or H1(57) or recommend that they are included as reserve sites only (to be called on should the other sequentially preferable sites fail in any way).

15 15 Do you want to speak at Public Examination? Yes

16 16 Subject to speak on at Examination

The allocation for residential development under H1(54) is fully supported. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,000 new homes on the site should be targeted, or it should be made clear that the 700 figure is not an upper limit.

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
Seecovering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2, and CE4.

Item Question

Tick-box reply

6 6 A new policy Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3209.D3//H01.57	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.64

Site: 438/ Hartridge Farm Road

Delete Site

Policy: H01.57

Map: Constraints Plan - East

Summary: Objects to inclusion of Hartridge Farm site as housing allocation.

Item	Question	Representation Text	Soundness Test	Tick-box reply
2	2	Policy Number H1		
4	4	The Proposals Map Proposals Map East		
14	14	Representation Support and Objection: H1(53) H1(56) and H1(57) – Housing The allocation for residential development under H1(53) is fully supported. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,000 new homes on the site should be targeted, or it should be made clear that the 700 figure is not an upper limit. For the reasons described above, we object to the allocations at H1(56) or H1(57) or recommend that they are included as reserve sites only (to be called on should the other sequentially preferable sites fail in any way).		
15	15	Do you want to speak at Public Examination?		Yes
16	16	Subject to speak on at Examination The allocation for residential development under H1(54) is fully supported. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,000 new homes on the site should be targeted, or it should be made clear that the 700 figure is not an upper limit.		
1	1	I think the LDP is sound.		No
13	13	Test of Soundness See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4.		
6	6	A new policy		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3209.D4//CF15	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.108

Policy: CF15

Summary: Size and function of school required at Alcan Site should reflect the number of units on the site.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number CF15	
3	3	Paragraph or section number(s) Paragraph 9.58	
7	7	A new paragraph or new text.	Yes
14	14	Representation Objection to Policy CF15 – School Site Policy CF15 states that new or enlarged schools are required at, inter alia, (iii) former Novelis site, Rogerstone. Paragraph 9.58 refers to the former Novelis (Alcan) site as being identified as a regeneration site for a predominantly residential led development. It states that provision of a primary school will be required on site as part of this development. The size and function of the school should be fairly related to the number of houses generated by the redevelopment of the site. The provision of primary school places should be commensurate to the size of the development and the developer should not be required to provide for, or contribute to any school capacity/places that are not generated by the development. The size of the school required should be informed by a capacity assessment of nearby schools and the size of the new school provisions should be reduced according to existing school capacities in the vicinity of the site. Change sought: reference required within the supporting text at paragraph 9.58 to the size of the primary school being directly related to the school places generated by the new development at the Novelis site and reduced in order to account for the number of existing free spaces within the same catchment.	
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination The size and function of the school should be fairly related to the number of houses generated by the redevelopment of the site. The provision of primary school places should be commensurate to the size of the development and the developer should not be required to provide for, or contribute to any school capacity/places that are not generated by the development. The size of the school required should be informed by a capacity assessment of nearby schools and the size of the new school provisions should be reduced according to existing school capacities in the vicinity of the site.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4.	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3209.D5//SP10	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.21

Policy: SP10

Summary: Request reduction in the new housing allocations

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number SP10

14	14	Representation Support and Objection: Strategic Policy SP1(ii) and SP10 – Development Sequence, Housebuilding Requirement and Phasing
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The above point about the capacity of the site is important when the plan's strategic policies are considered. Policy SP1(ii) makes it clear that the DLDP's priority is to secure the regeneration of previously developed sites before Greenfield land is released for development. This is sensible and sustainable and reflects a strong and established national policy direction. It is then repeated in much of the language of Policy SP10, but is undermined by the sequence that the policy uses (in points i – iv) and the inclusion of some Greenfield allocations that this list relies on.

Our main point here is that, if the plan takes a more realistic view on the contribution that the Novelis site can make, there will be less need for it to rely on any new Greenfield land releases. This is especially the case if the level of provision is reconsidered and reduced.

As we see it at the moment, the DLDP proposes a very high amount of housing and a lot more than the level set out in SP10 (which adds up to 8,750 new homes). The figure that the sites summarised under parts i – iv comes to over 11,000 which, on the face of it, is a significant and unnecessary contingency – even before the additional amount that the Novelis site could add.

On this basis and either to reflect the extra development that Novelis could deliver, or the need to reduce the over provision, the new Greenfield sites identified in the plan should be deleted (see below). This would improve the performance of the plan without threatening the delivery of the housing numbers that lies at the heart of its housing strategy.

The alternative would be to establish a clearer sequence in points i – iv of Policy SP10. At the moment this could see no distinction between the new allocations in Policy H1. We are sure that this is not the intention of the DLDP's authors, but it could be the outcome. It can be straightforwardly resolved by making it clear that the preference in each category will be for the redevelopment of previously developed sites rather than through the release of Greenfield land. This installs the proper planning sequence. A second alternative if the Council was adamant that new Greenfield releases are necessary is to ensure that they are only made in later phases of the plan period (during 2021 – 2026). This then provides a safeguard in the very unlikely event that any of the sites do not perform.

On this basis, whilst we support Policy SP1, we object to Policy SP10 as it is currently drafted. The change sought is either to make a reduction on the new allocations (see below) and/or to make it clear that a sequential approach will be adopted which explicitly prioritises the redevelopment of previously developed sites in all the categories listed under parts i – iv of the Policy.

<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>	<i>Tick-box reply</i>
1	1	I think the LDP is sound.	No
13	13	Test of Soundness See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4.	
6	6	A new policy	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3209.D6//EM02.12	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.78

Site: 441/ Former Alcan Site

[Delete Site](#)

Policy: EM02.12

Summary: Objects to inclusion to Alcan site as regeneration site, should be allocated solely as a housing allocation.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number EM2	
3	3	Paragraph or section number(s) Paragraph 6.35	
7	7	A new paragraph or new text.	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Objection to Policy EM2 – Regeneration Site

Policy EM2(xii) allocates the site as a 'Regeneration Site' for 37Ha of B1, Commercial, Leisure, Residential and Community Uses.

Whilst the principle of allocating the site for regeneration purposes is supported, there is concern that the dual allocation of the site for residential use, under Policy H1, and business, commercial, leisure, residential and community uses, under EM2, dilutes the primary purpose of allocating the site for residential use. Consequently an objection is required.

Policy EM2(xii) also incorrectly identifies the site as being 37Ha. Policy H1(54) correctly refers to the site area as 40Ha.

Further explanatory text, at paragraph 6.35 of the DLDP, states that redevelopment of the site will require a master plan approach and that a provision of a primary school will be required on site as part of the development. Reference is also made to the need for a flood consequences assessment and the potential for hydraulic modelling to be undertaken.

The concern is that the residential uses allocated under H1(54) do not take the priority that they should within the policy wording of EM2(xii).

A similar situation arose in relation to the allocation at Monmouthshire Bank Sidings, whereby the site was allocated for residential use under a housing policy of the UDP. The site was also allocated for mixed use under a regeneration policy. This contradiction led to protracted negotiations between the landowner and the LPA, eventually leading to long delays in achieving an outline consent, as the matter needed to be settled through appeal. In the appeal decision letter, the Minister and the Inspector clearly concluded that the housing allocation for the site (which continues to be allocated within the DLDP) took precedent over the regeneration policies identifying the site for mixed use. A similar situation has now been incorporated into the DLDP. Whilst we would expect the same conclusions to be reached in respect of the priority of the residential allocation through H1(54), the removal of the Novelis site from Policy EM2 would remove the potential for future uncertainty over the mix of uses and the priority that should be given to residential development within the site.

On the matter of the mix of uses, the submission at the Planning Inquiry on Monmouthshire Bank Sidings indicated that the UDP provided for over 65 years worth of employment land supply within the plan area. Consequently, there is little justification for the inclusion of B1 uses within the Novelis site allocation, particularly given the large scale allocations set out under Policy EM1 for the remainder of the Borough.

The allocation on Novelis under H1 is adequate to bring the site forward for development. Whilst the scheme is undoubtedly a regeneration scheme, it does not need to be allocated under Policy EM2. As a consequence, the reference to Novelis under EM2(xii) should be deleted.

Preferred Change sought: EM2(xii) should be deleted.

Should the Council wish to retain reference to Novelis within Policy EM2, the reference under (xii) and the supporting text at paragraph 6.35 should make it clear that residential use is the predominant use for the site and the commercial, leisure and community uses are suitable additional uses but ultimately optional and interchangeable with each other.

Change sought if EM2(xii) to be retained: EM2(xii) changed to read – Novelis (former Alcan site), Rogerstone, 40Ha for predominantly residential use with potential for ancillary B1, commercial, leisure and community uses.

15	15	Do you want to speak at Public Examination?								
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Yes

16	16	Subject to speak on at Examination								
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Whilst the principle of allocating the site for regeneration purposes is supported, there is concern that the dual allocation of the site for residential use, under Policy H1, and business, commercial, leisure, residential and community uses, under EM2, dilutes the primary purpose of allocating the site for residential use. Consequently an objection is required.

<i>Item Question</i>	<i>Soundness Test</i>									
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1	1	I think the LDP is sound.								
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No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
13 13	Test of Soundness									
See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4.										
<i>Item Question</i>						<i>Tick-box reply</i>				
6 6	A new policy									
3209.D7//GP01	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.36

Policy: GP01

Summary: Change wording of Policy GP1 (ii).

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number GP1	
14 14	Representation Objection to Policy GP1 – General Development Principles – Climate Change Reference is made within Policy GP1 to development proposals being designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including site energy provision, where possible. Whilst the aim to minimise energy requirements is supported, the provision of renewable, low or zero carbon energy sources within development sites is in its infancy and experience suggests that it is proving very difficult to find viable solutions for on site renewable energy production. The indication that on site energy provision should be made, where possible, should also include the caveat that it should also be viable and practical. Change sought: change to GP1(ii) to read – Development proposals should: be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where viable and practical.	
15 15	Do you want to speak at Public Examination?	No
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
13 13	Test of Soundness See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4.	
<i>Item Question</i>		<i>Tick-box reply</i>
6 6	A new policy	Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3209.D8//GP03	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.38

Policy: GP03

Summary: Concern Policy GB3 will restrict development

Item Question Representation Text

2 2 Policy Number
GP3

14 14 Representation

Objection to Policy GP3 – General Development Principles – Service Infrastructure

Criteria (ii) of Policy GB3 refers to capacity within the public foul sewer system and effectively would prevent development where deficiencies exist or satisfactory improvements cannot be provided.

Whilst it is correct that developments should be served by appropriate infrastructure, there is significant concern that the emphasis within Policy GP3 is on the advice of statutory undertakers in determining whether satisfactory infrastructure exists. The overriding concern in this respect is that planning applications could be held up due to protracted consultation exercises with statutory undertakers, which has been the case in the past. Effectively, progress and regeneration will depend on the responses from statutory undertakers. Where appropriate, technical reports support applications demonstrating acceptable service infrastructure, or solutions to provide upgrades and, therefore, the grant of planning permission should not be delayed, subject to appropriate and relevant conditions.

Change sought: delete criteria (ii) of Policy GP3

15 15 Do you want to speak at Public Examination?

No

Item Question Soundness Test

1 1 I think the LDP is sound.

No

13 13 Test of Soundness

See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4.

Item Question

6 6 A new policy

Tick-box reply

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3209.D9//IR	Walers Land (Rogerstone) Ltd	Savills		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.127

Policy: IR

Summary: Require clarity on Chapter 13 - Infrastructure requirements

Item Question Representation Text

3 3 Paragraph or section number(s)
Table 13.1

14 14 Representation

Objection under Chapter 13 – Infrastructure Requirement

Table 13.1 sets out the infrastructure necessary to deliver sites allocated within the LDP. The Novelis site is referred to under H1(53).

The text refers to utility requirements as follows:

Utilities: Developer to upgrade water and sewerage systems to the necessary standards and capacity requirements over and above capacity available from the replacement of existing uses on the site.

The statement is not clear and may not be a necessary requirement given that the water demands from the previous use would have been substantial. The requirement should be only to serve the needs of the proposed development. As a consequence the text should be revised to reflect the need for capacity to be commensurate to the scale of the development proposed.

Change sought: utilities reference to be changed within H1(53) of table 13.1 to the following - Water and sewerage systems to be investigated and upgraded, if necessary, to the standards and capacity required by the proposed development, taking into account the previous uses on the site.

15 15 Do you want to speak at Public Examination? No

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness

See covering letter dated 28 May 2012. The plan fails test of soundness CE1, CE2 and CE4.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3210.D11//H01	Hillvale Properties Ltd	Mango Planning & Development		28/05/2012	<input type="checkbox"/>	W	O		M	

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 341/ Hanbury Garage

Boundary Change

Policy: H01

Map: Inset 27: Caerleon Inset Plan

Summary: Objection to the boundary proposed at Caerleon and propose a mixed use redevelopment of the Hanbury Garage site

Item	Question	Representation Text	Response
4	4	The Proposals Map	Yes
5	5	Inset Plan(s) 27 Caerleon	Yes
9	9	Amend the boundaries of an existing site.	Yes
14	14	Representation	

The representation site should be allocated as a mixed use gateway centre for tourism, parking, leisure and retail and improvements to the highway.

On behalf of Hillvale Properties Limited: Representations to Newport LDP Deposit Draft in respect of land at Hanbury Garage, Caerleon

Introduction

Our client has an interest in land adjoining the B4236 at the southern gateway to Caerleon comprising the former Hanbury Garage and shop ("The Garage Site"), Bridge House and adjoining land. The Garage Site is presently vacant and detracts from the character and appearance of the Conservation Area within which it falls. Bridge House is a residential dwelling. The opportunity The Garage Site presents an opportunity for a comprehensive mixed use redevelopment to provide a high quality gateway scheme that will both preserve and enhance the Conservation Area and facilitate improvements to the curvature of the existing roadway so as to enable HGVs to pass, addressing one of the key highway problems of the town and improving vehicular flows into and out of Caerleon.

It is proposed that this site be anchored by tourism and small scale retail/commercial development. The site will also present opportunities for leisure and interpretation facilities associated with its the historic context.

The development also has the potential to provide car parking to serve both the development and the wider parking needs of Caerleon's town centre and its historical attractions. Adjoining land between the Garage site and White Hart Lane would remain as open space to complement the setting of the development.

The Bridge House site would be redeveloped as as a care home and would benefit from improved access via the alterations outlined above.

Proposed changes sought To facilitate the above gateway development it is requested that the deposit LDP be revised as follows:

1. The entire representation site is brought within the settlement boundary of Caerleon; and
2. The entire representation site is identified for mixed use development reflecting the form of the development outlined above.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
16 16	Subject to speak on at Examination									
	We would like to discuss with the Inspector the merits of allocating the site for a mixed use gateway centre.									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.					No				
<i>Item Question</i>						<i>Tick-box reply</i>				
8 8	Add a new site.					Yes				

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3210.D2//EM02	Hillvale Properties Ltd	Mango Planning & Development		28/05/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.77

Policy: EM02

Map: Inset 27: Caerleon Inset Plan

Summary: Site should be allocated as a mixed use site and housing allocation deleted.

Item	Question	Representation Text	Response
4	4	The Proposals Map	Yes
5	5	Inset Plan(s) 27 caerleon	
9	9	Amend the boundaries of an existing site.	Yes
14	14	Representation	

The representation site should be allocated as a mixed use gateway centre for tourism, parking, leisure and retail and improvements to the highway.

On behalf of Hillvale Properties Limited: Representations to Newport LDP Deposit Draft in respect of land at Hanbury Garage, Caerleon

Introduction

Our client has an interest in land adjoining the B4236 at the southern gateway to Caerleon comprising the former Hanbury Garage and shop ("The Garage Site"), Bridge House and adjoining land.

The Garage Site is presently vacant and detracts from the character and appearance of the Conservation Area within which it falls.

Bridge House is a residential dwelling. The opportunity The Garage Site presents an opportunity for a comprehensive mixed use redevelopment to provide a high quality gateway scheme that will both preserve and enhance the Conservation Area and facilitate improvements to the curvature of the existing roadway so as to enable HGVs to pass, addressing one of the key highway problems of the town and improving vehicular flows into and out of Caerleon.

It is proposed that this site be anchored by tourism and small scale retail/commercial development. The site will also present opportunities for leisure and interpretation facilities associated with its the historic context.

The development also has the potential to provide car parking to serve both the development and the wider parking needs of Caerleon's town centre and its historical attractions. Adjoining land between the Garage site and White Hart Lane would remain as open space to complement the setting of the development.

The Bridge House site would be redeveloped as a care home and would benefit from improved access via the alterations outlined above.

Proposed changes sought To facilitate the above gateway development it is requested that the deposit LDP be revised as follows:

1. The entire representation site is brought within the settlement boundary of Caerleon; and
2. The entire representation site is identified for mixed use development reflecting the form of the development outlined above.

Additional Information Submitted - Available on Request

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Yes							
16 16	Subject to speak on at Examination									
	We would like to discuss with the Inspector the merits of allocating the site for a mixed use gateway centre.									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		No							
<i>Item Question</i>			<i>Tick-box reply</i>							
8 8	Add a new site.		Yes							

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3211.D1//H01	Nednil Ltd	WYG Group Ltd		09/07/2012	<input type="checkbox"/>	E	P		M	

Document: Deposit Plan, p.62

Site: 288/ Bettws Hill

New Site

Policy: H01

Summary: Amend Policy H1 to include new residential allocation site at Bettws Hill.

Item Question *Representation Text*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

Policy H1 should be amended to include a new residential allocation site at Bettws Hill, Bettws (site plan enclosed), in order to ensure that there is an adequate supply of land to enable delivery of the phased housing requirements set out in Policy SP10 (and in particular the first phase requirement (2011-16)); in order to ensure a continuous 5 year supply of available land within the City and in order to ensure that there is adequate choice of housing within the Bettws/Malpas area of the City.

Rationale for Proposed Change

We consider that there is too much reliance within the Deposit Draft LDP on Which part of the Plan are you commenting on? (Please use separate forms for each topic you wish to comment on)

Policy Number H1

Paragraph or section

number(s)

The Proposals Map

Inset Plan(s)

Would you like the Plan to include a new policy, paragraph or site? (Tick all that apply)

1. A new policy
2. A new paragraph or new text
3. Add a new site
4. Amend the boundaries of an existing site
5. Delete an existing site

If you want to add, amend or delete a site, did you submit the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known):

Site Name: Bettws Hill, Bettws Site Reference:

If you think the plan does not meet one or more tests of soundness (see Part 2), please indicate here which test(s) it does not meet:

C2, CE1, CE2

Please continue on a separate sheet if necessary

4 brownfield sites to deliver the required levels of housing over the Plan period. We estimate that some 94% of the land identified as existing commitments, existing commitments subject to Section 106 agreement, land under construction and allocations under Policy H1 can be classed as brownfield land. Therefore, while the total quantum of land committed, under construction, or proposed to be allocated in Policy H1 is, in theory, sufficient to provide the required number of houses over the plan period, the timing of delivery of many sites within Policy H1 is uncertain. This is because a substantial proportion of the brownfield land supply in Newport is constrained and would be relatively expensive to develop compared to greenfield land. The inhibiting effects of the various brownfield land constraints have been exacerbated by current economic recession which has had a significant adverse impact on the availability of investment finance (secured from either private or public sectors) to enable site development. In particular, there are a number of large committed or (proposed) allocated sites which are reliant on private sector funded major infrastructure works to unlock site constraints relating to highways and flood risk. In the current economic climate the private sector is unwilling or unable to shoulder the financial risks associated with such upfront development costs and this will inevitably add to delay and uncertainty in the timing of planned housing delivery.

While Policy SP10 sets out a phased requirement for housing land delivery there is, therefore, considerable uncertainty that the phased requirements will be met, particularly the provision for the 2011-2016 period in the light of the above constraints.

As is acknowledged in the published Housing Background Paper (April 2012), the last published Joint Housing Land Availability Study for Newport (dated May 2011 but setting out the position as a April 2010) shows that using the standard residual calculation method to determine land supply, there is only a 3.5 year supply of available housing land in the City of Newport. It is acknowledged in that document that the down turn in the economy has had a significant impact on house building activity within the City with housing completions in 2009/10 dipping substantially compared to the previous year. Given that the economy has now 'double dipped' into recession and that new housing completion levels continue to be at historically low levels, it is highly likely that an updated Housing Land availability Study would show at best, no improvement on the April 2010 position). Paragraph 14.2 of the Joint Housing Land Availability Study it is stated " the current economic climate has had an effect on many large sites, with developers slowing their build rate of stopping their production all together on some sites. This has meant that some sites or phases of sites have been moved back out of the 5-year supply,....." The heavy reliance on brownfield land development within Policy H1 will, in our view, continue to make it difficult for the LDP to fulfil the requirement of paragraph 9.2.3 of Planning Policy Wales which states that "Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing, judged again general objectives and the scale and location of development provided for in the development plan." In addition, we consider that within the LDP there is undue focus on providing for housing requirements on land within Newport to the south of the M4. The sustainable growth of settlements north of the M4 will be restricted by lack of readily available sites for new housing. In that respect, the LDP fails to take into account paragraph 5

9.2.5 of Planning Policy Wales, which states that "In producing their development plans local planning authorities should devise a settlement strategy which establishes housing policies in line with their local housing strategy and spatial pattern of housing development balancing social, economic and environmental needs." The approach of the LPA in meeting housing requirements appears to be driven primarily by the availability of brownfield sites, rather than any reasoned strategy of meeting localised housing needs within the whole of the City and within its constituent parts. In that respect we note that there are only two sites allocated for housing in Bettws and Malpas, sites H1 (39) and H1 (46). In total they are likely to yield a maximum of 208 houses. Both of the allocated sites are brownfield.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The allocation of the site at Bettws Hill, which is a greenfield location, will enable housing needs to be met locally on a site that is readily available and with no overriding constraints. The site relates well to existing and new housing developments. It is sustainable (i.e. it is close to local amenities such as shops and schools), accessible by a choice of modes of transport and is capable of making a positive contribution to the environment through the dedication of an attractive and ecologically rich woodland to an appropriate management body to preserve and enhance its environmental and conservation importance. A full sustainability appraisal, identical in scope and level of detail to those conducted by the Authority, has been carried out on the proposed residential allocation site and that assessment is attached in the form of a completed Candidate Sites form and OS based site plan showing the Candidate Site in red and adjoining land in the same ownership edged in blue. We conclude that the land in question has the capacity to accommodate around 100 units and we therefore seek that the following amendment to the Plan.

The following sites of 10 or more dwellings are new allocations for residential development.

LDP Ref. Site Name Hectares Estimated units not started at 1 October 2011 Estimated units likely to be produced by 1 April 2026

H49 Mill Street 0.4 12 12

H50 Herbert Road &

Enterprise House

2.4 62 62

H51 Whiteheads Works 18.7 400 400

H52 Old Town Dock Remainder

13.9 556 556

H53 Bideford Road 1.1 35 35

H54 Former Alcan Site 40 700 700

H55 Crindau 11.7 420 420

H56 Woodland Site, Ringland

7.8 300 300

H57 Hartridge Farm Road

9.7 290 290

?? Bettws Hill 3.73 100 100

6

TOTAL NEW HOUSING SITE ALLOCATIONS 109.43 2875 2875

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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We wish to make a detailed case for the allocation of the site in the context of detailed evidence regarding the availability of sites committed for development and proposed allocations for residential development relative to the phased housing provisions of the Plan, the proportion of brownfield vs greenfield and distribution of housing land and the five year housing land availability within the City.

Item	Question	Soundness Test	Response
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C2, CE1, CE2	
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3212.D11//EM02	Wye Valley Investments Ltd	GVA Grimley		11/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.77

Site: 405/ Existing Sainsburys

Boundary Change

Policy: EM02

Summary: Site Ref H31 (Sainsburys) should be treated as an urban regeneration site under policy EM2

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number EM2	
4	4	The Proposals Map Allocation H32	Neither
7	7	A new paragraph or new text.	Yes
11	11	Site Name Existing Sainsbury's	
12	12	Site Reference 56	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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We note that the deposit LDP formally allocates 'the existing Sainsburys' as a housing allocation under Policy H1 (LDP Ref H32) Whilst we welcome the formal recognition in the Deposit LDP of the significant redevelopment opportunity presented by the existing Sainsburys site, we do not consider that this housing allocation is the most appropriate manner in which to treat the site in the LDP. As such, we therefore object to the LDP in its present state. We detail below the reason for this objection, together with our suggested approach to rectifying this issue so that the plan can be considered to be sound. We consider that the housing allocation (Ref H32) does not take full account of the the present (and likely future) planning status of this important site. As your Authority will be aware, there is a current resolution to grant outline planning permission (App Ref 09/0733) for the mixed use redevelopment of this site. A copy of the Committee report of 11 th November 2009 is attached with these representations This provides an overview of the development to which this resolution relates. This resolution to grant planning permission is subject to the completion of a Section 106 agreement. We, at GVA, are currently at an advanced stage in negotiating the S1 06 legal agreement with Newport City Council on behalf of the current landowners. It is therefore expected that formal planning permission for the mixed use redevelopment of the site will be secured in the near future.

In light of this situation we consider that the LDP should be amended to reflect the site's mixed use development potential, as opposed to its current treatment solely as a housing site. We therefore suggest that the site should be treated as an 'urban regeneration' site under policy 6M2 of the LDP, as opposed to being allocated solely for housing under Policy H1 Such an amendment would more accurately reflect the current planning situation associated with the site and provide the required flexibility. In order to facilitate the redevelopment of this site over the LDP period. At present there is a risk that any proposed uses, apart from residential, could potentially fall foul of the policy context that seeks to ensure residential development only at the site. We are sure that this is not the intention of the plan and that this oversight can be simply dealt with by the reallocation of the site from housing to urban regeneration. We therefore request that the site be allocated under Policy EM2, with supporting text as follows

Existing Sainsburys

This area of land has a resolution to grant planning permission for mixed use, residential led development. It is expected that the site will deliver mixed use redevelopment over the LDP plan period and such development will be encouraged.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	No
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Item	Question	Soundness Test
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1	1	I think the LDP is sound.	No
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13	13	Test of Soundness CE2, CE4
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Item	Question	Tick-box reply
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6	6	A new policy	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3212.D2//H01	Wye Valley Investments Ltd	GVA Grimley		11/07/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 405/ Existing Sainsburys

Boundary
Change

Policy: H01

Summary: Site Ref H31 (Sainsburys) should be treated as an urban regeneration site under policy EM2

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number H1	
4	4	The Proposals Map Allocation H32	
7	7	A new paragraph or new text.	Yes
11	11	Site Name Existing Sainsbury's	
12	12	Site Reference 56	

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

We note that the deposit LDP formally allocates 'the existing Sainsburys' as a housing allocation under Policy H1 (LDP Ref H32) Whilst we welcome the formal recognition in the Deposit LDP of the significant redevelopment opportunity presented by the existing Sainsburys site, we do not consider that this housing allocation is the most appropriate manner in which to treat the site in the LDP. As such, we therefore object to the LDP in its present state. We detail below the reason for this objection, together with our suggested approach to rectifying this issue so that the plan can be considered to be sound. We consider that the housing allocation (Ref H32) does not take full account of the the present (and likely future) planning status of this important site. As your Authority will be aware, there is a current resolution to grant outline planning permission (App Ref 09/0733) for the mixed use redevelopment of this site. A copy of the Committee report of 11 th November 2009 is attached with these representations This provides an overview of the development to which this resolution relates. This resolution to grant planning permission is subject to the completion of a Section 106 agreement. We, at GVA, are currently at an advanced stage in negotiating the S1 06 legal agreement with Newport City Council on behalf of the current landowners. It is therefore expected that formal planning permission for the mixed use redevelopment of the site will be secured in the near future.

In light of this situation we consider that the LDP should be amended to reflect the site's mixed use development potential, as opposed to its current treatment solely as a housing site. We therefore suggest that the site should be treated as an 'urban regeneration' site under policy 6M2 of the LDP, as opposed to being allocated solely for housing under Policy H1 Such an amendment would more accurately reflect the current planning situation associated with the site and provide the required flexibility. In order to facilitate the redevelopment of this site over the LDP period. At present there is a risk that any proposed uses, apart from residential, could potentially fall foul of the policy context that seeks to ensure residential development only at the site. We are sure that this is not the intention of the plan and that this oversight can be simply dealt with by the reallocation of the site from housing to urban regeneration. We therefore request that the site be allocated under Policy EM2, with supporting text as follows

Existing Sainsburys

This area of land has a resolution to grant planning permission for mixed use, residential led development. It is expected that the site will deliver mixed use redevelopment over the LDP plan period and such development will be encouraged.

Additional Information Submitted - Available on Request

15 15	Do you want to speak at Public Examination?	No
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<i>Item Question</i>	<i>Soundness Test</i>
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1 1	I think the LDP is sound.	No
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13 13	Test of Soundness CE2, CE4
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<i>Item Question</i>	<i>Tick-box reply</i>
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6 6	A new policy	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3213.D1//EM01	K & W Development Ltd	Mango Planning & Development		09/07/2012	<input type="checkbox"/>	E	P		M	

Document: Deposit Plan, p.73

Site: 329/ West Way

New Site

Policy: EM01

Summary: Amendment to policy to allocate new site for bulky good retail use.

Item	Question	Representation Text	Soundness Test
2	2	Policy Number EM1	
3	3	Paragraph or section number(s) vii	
4	4	The Proposals Map Proposals Map West	
14	14	Representation Part of the site is proposed to be allocated for employment uses within the Deposit LDP. The site also now benefits from an existing planning permission for mixed-use redevelopment, which proposes uses that go beyond B1/B2/B8 and extend to sui generis/pseudo-retail (LPA Ref: 07/0508). By granting this planning permission, the LPA has acknowledged that the site is suitable and capable of accommodating uses other than B1/B2/B8. As such, the continued allocation of the site for employment use is inappropriate given this recent history. There is an acknowledged need for further bulky goods retail in Newport within the development plan period. By allocating this site for bulky goods retail, the LPA will maximise potential for a key vacant brownfield site to be brought in to beneficial use. The site is uniquely placed to fulfill a complimentary role to the existing 28 East Retail Park and other surrounding retail uses. Indeed, the proposed bulky goods use represents an extension to the existing retail uses in the area, such that would warrant the overall area being recognised as a District Centre. The accompanying sustainability appraisal demonstrates that the redevelopment of the site for bulky goods retail will create new jobs, provide new local shopping facilities and has the potential to enhance links to existing open space (adjacent YMCA). On the basis of the above, my client respectfully requests that this site be allocated for bulky goods retail use in the LDP and that the site, together with the 28 East Retail Park be allocated as a District Centre.	
Additional Information Submitted - Available on Request			
15	15	Do you want to speak at Public Examination?	Yes
16	16	Subject to speak on at Examination Appearing at the hearing will allow a more detailed consideration of the background and benefits of the redevelopment of this key brownfield site.	
1	1	I think the LDP is sound.	No
13	13	Test of Soundness CE1, CE2, CE4	

Item Question

Tick-box reply

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
8 8	Add a new site.				Yes					

3213.D2//EM01	K & W Development Ltd	Mango Planning & Development		09/07/2012	<input type="checkbox"/>	E	P		M	
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SA/SEA submitted

Document: Deposit Plan, p.73

Site: 331/ West Way

New Site

Policy: EM01

Summary: Allocation of new District Centre including Land at West Way and Land at 28 East Retail Park

Item Question Representation Text

14 14 Representation

Part of the site is proposed to be allocated for employment uses within the Deposit LDP.

The site also now benefits from an existing planning permission for mixed-use redevelopment, which proposes uses that go beyond B1/B2/B8 and extend to sui generis/pseudo-retail (LPA Ref: 07/0508). By granting this planning permission, the LPA has acknowledged that the site is suitable and capable of accommodating uses other than B1/B2/B8. As such, the continued allocation of the site for employment use is inappropriate given this recent history. There is an acknowledged need for further bulky goods retail in Newport within the development plan period. By allocating this site for bulky goods retail, the LPA will maximise potential for a key vacant brownfield site to be brought in to beneficial use. The site is uniquely placed to fulfill a complimentary role to the existing 28 East Retail Park and other surrounding retail uses. Indeed, the proposed bulky goods use represents an extension to the existing retail uses in the area, such that would warrant the overall area being recognised as a District Centre.

The accompanying sustainability appraisal demonstrates that the redevelopment of the site for bulky goods retail will create new jobs, provide new local shopping facilities and has the potential to enhance links to existing open space (adjacent YMCA).

On the basis of the above, my client respectfully requests that this site be allocated for bulky goods retail use in the LDP and that the site, together with the 28 East Retail Park be allocated as a District Centre.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination?

16 16 Subject to speak on at Examination

Appearing at the hearing will allow a more detailed consideration of the background and benefits of the redevelopment of this key brownfield site.

Item Question Soundness Test

1 1 I think the LDP is sound.

No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3214.D1//EM02	Collingbourne Properties	Hannaby Planning Solutions		28/05/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.77

Site: 330/ Old Town Dock

New Site

Policy: EM02

Summary: Submission of land at Usk Way

Item Question Representation Text

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
14 14	Representation									

Introduction

This report has been prepared by Hannaby Planning Solutions on behalf of Collingbourne Properties, the owner of land fronting Usk Way, Portland Street, Mill Parade and Church Street Newport as shown edged in red on the aerial photograph at Appendix 1.

The land is has been assembled by Collingbourne Properties over a number of years. The report also considers adjoining land in the ownership of others where those owners have expressed an interest in developing their land in conjunction with Collingbourne Properties but this report has not been prepare on their behalf.

The purpose of the report is to support the allocation of this land as a strategic urban regeneration site as part of the Newport Local Development Plan (LDP). At this stage the proposals are in concept form and it is acknowledged that the report does not include supporting survey reports at this stage.

Site Location and Context

The land lies at the southern end of Pillgwenlly and has frontages to both the key Southern Distributor Road (SDR) and Usk Way. The SDR provides a strategic east-west link, skirting around the southern side of the city whereas Usk Way provides a north-south link into the City Centre, less than 1 mile away.

The site lies either side of the SDR, incorporating land: on the western side of Usk Way at its southern end, between Portland Street and Kings Parade; between Church Street and Mill Parade; along the southern side of the SDR running from City Bridge to its roundabout with Mill Parade; and, beyond the roundabout, between the SDR and Mill Parade .

The site is currently either vacant or in a variety of commercial uses. It is surrounded by a mixture of residential and commercial development. On the opposite side of Usk Way is partially completed Old Town Dock development, which has been partially developed for residential use by the Fairlake development at Mariners Quay and the Redrow development at Alexandra Gate along the eastern side of East Dock Road. At the junction of East Dock and Usk Way lies a BMW car showroom but all of the land south of it between Usk Way and East Dock Road is vacant.

The site is prominent and apart from the obvious negative aspects of the site; its run-down appearance, a number of 'dirty' industrial uses and its poor quality environment, it also has a variety of positive attributes. These include the site's frontage to the SDR and Usk Way, a visually prominent and easily accessible location, it's historic significance (including 2 listed buildings), existing pedestrian links to the Riverside Park; and its proximity to the residential areas of Pillgwenlly. Policy Context National and Local Policy firmly encourage a positive attitude to regeneration. The site is wholly located within Newport City Council's administrative area, where the development plan consists of the UDP which was adopted in May 2006. The site is currently almost ignored in the UDP and the adopted and draft Supplementary Planning Guidance (SPG) relating to the Old Town Dock area.

Adopted UDP:

The main emphasis of the plan is a 'brownfield' regeneration strategy with the SDR seen as a tool to enhance accessibility to the city centre and facilitating the development of many of regeneration sites. To support its principle aim of regeneration at paragraph 1.19 the stated objectives of the UDP include 'The promotion of regeneration opportunities in inner urban areas including Newport City Centre, Pillgwenlly and the Usk Riverfront.' and strategic policy SP17, which states that 'proposals will be favoured which assist the regeneration of the urban area, and in particular their potential contribution to:

- i) the vitality, viability and quality of environment of the city centre;
- ii) the provision of residential and business opportunities within the urban area;
- iii) the reuse of vacant, underused or derelict land.'

The UDP recognised that there had been redevelopment in the City and that further regeneration was planned by Newport Unlimited but it welcomed further initiatives to regenerate district centres and major route corridors, such as Usk Way and the SDR, emphasising that redevelopment of derelict and vacant urban sites will be supported.

Policy CE30 specifically addresses the issue of urban regeneration, stating that schemes will be encouraged especially where they deliver:

- i) the protection and enhancement of the built and natural environment, townscape qualities and the condition and appearance of buildings , especially in the usk riverfront corridor, pillgwenlly, other older inner areas, the city centre, district centres and major route corridors;
- ii) re-use of vacant and derelict land and buildings provided that the design policies of this plan are met;
- iii) a reduction in the adverse effects of road traffic'

Policy CE32 recognises that the impression gained by visitors or residents using main routes into and around the City is important and has both economic and environmental implications, stating that 'the protection and enhancement of the appearance of existing and future main route corridors will be sought by the control of development and by undertaking, and encouraging individuals and public and

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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private organisations to undertake environmental improvement works.' The SDR and Usk Way are included in the list of routes identifiedThe UDP also recognised the damage to the economy from derelict or unsightly land and policies CE36 and CE37 specifically addressed these issues stating that the council will support the reclamation of derelict land, with priority given to schemes 'along the banks of the river usk.....in the urban area which have an economic afteruse particularly for housing or employment uses' and 'which will result in significant visual or other environmental improvement.'

Specific policies encouraging the regeneration of the area around Usk Way and Old Town Dock included policy ED2, recognising that some sites were already available for development, including the Old Town Dock, but also encouraging comprehensive schemes to come forward which may require land assembly and the relocation of existing uses. The importance of the Usk Riverfront, in terms of nature conservation was also recognised, especially its significance as a Site of Special Scientific Interest and a Special Area of Conservation.

The LPA has produced SPG for the area, the 'Newport Old Town Dock Development Brief Supplementary Planning Guidance,' in December 2005 and a draft addendum produced by Powell Dobson Urbanists on behalf of Newport Unlimited in December 2011. The 2005 SPG covered a part of the site but failed to propose any real solutions for the land south of the SDR, concentrating on the land to the north of the SDR and east of Usk Way, primarily showing it as an area of riverside park.

The latest draft review is worse in that it identifies the land south of the SDR as being unlikely for development, brushing it aside for the immediate future. This shows a lack of engagement with the owner of the land who has secured consent for residential apartments on a part of the land in question and has been assembling land for development.

The thrust of the draft SPG is 'flexibility not prescription' which could be applied just as well to the Collingbourne Properties site.

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?								Neither
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<i>Item</i>	<i>Question</i>	<i>Soundness Test</i>								
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1	1	I think the LDP is sound.								Neither
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Representation Details

Newport City Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3215.D2//H01.54	Thomas, Mrs Claire			09/07/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.64

Site: 440/ Former Alcan Site

Delete Site

Policy: H01.54

Summary: Concerns about development of the Alcan site, Rogerstone

Item	Question	Representation Text
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14	14	Representation
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Having attended the meeting in Rogerstone on the LDP, please find my comments and concerns for Rogerstone below.

We have lived in Rogerstone for 4 years, but have family who have lived here since the 1970's, so have a long association with the area. Obviously there has been significant growth in Rogerstone over that time, particularly with the Afon Village estate development.

I feel that the area is now at capacity, the infrastructure is straining under the current usage. Highway capacity implications were raised at the meeting, and I second this. At rush hours the area is gridlocked from around 7.30 til 9, and then from 4 onwards. Access to the M4 is painful on most days on route to work. Proposed development on the Alcan estate would only exacerbate the problems encountered. While we were advised that there is existing capacity on the consent, I see little evidence of this.

The road conditions are also bad in many areas. The Council appear to be patching up holes rather than re-surfacing bad roads. This has recently occurred outside our house on Risca Road

I have concern about schools. Rogerstone Primary is increasing in size each year, with little communication to parents in the area, especially from the school. We have heard from affected parents that there will be another 3 form intake for the second year, which means there will be 60 more children in situ by September compared to 2 years ago. While we have a great environment, much better than other older local schools, I feel this is a detriment to the pupils attending. I was victim to the over subscription to a school when I moved from Newport to Rogerstone in 2008 and my appeal was declined. My first daughter had to attend Mount Pleasant until a place became available part way through year 1. I had to accept this at the time, but it was very stressful. I hear that the extra children are in catchment, but am not sure this is the case.

I also have future concerns about secondary schools. I understand that Bassaleg Comprehensive, which myself and my husband attended many years ago, is now a very large school indeed. I expect that numbers again grew with the Afon Village estate. I am worried how my children will cope there if it continues to grow, having heard that there are normal adolescent problems there exacerbated by sheer numbers. I hope that a suitable and workable school will be in place by the time my children go there.

Other services seem to be at capacity - doctors and dentists. While we have parks and can use a Caerphilly (Risca) Leisure Centre, most are in need of upgrade compared to neighbouring Authorities (particularly the Ty Du park). I would welcome further and better provision over longer hours. The RiverMead centre was a start, but it seems to have limited open hours and would also benefit from a good quality park.

Another concern is that the plan is not taking full account of empty homes. I raised this question and was told that the plan did factor this in. I am however not convinced that Newport has a robust empty homes policy. A house 2 doors from ours has been partially converted from a bungalow to a house for c20 years. It is an eye sore (breeze block walls) that my neighbours, and my parents who have lived in the house before us, have lived with for many years, and which the owner refuses to complete or sell. I know of other houses in the area that are empty and would be interested to know if there is a register of empty homes held by the Council, and what the numbers are. I have contacted the council on this matter, but have been told there is little they can do in the short term (even after 20 years!)

I was pleased to be involved in the meeting and felt that it was handled very well by the councils representatives, and the Councillors, especially Chris Evans, given the "Save Bethesda Field" "activists" presence. Its interesting that these residents bought houses that were previously a field that residents in Bethesda Place tried to resist a few years ago. I am also confused about how the Community Council can continue its quest to sell this land for housing when it appears that the majority of residents in the area, but just in the adjoining road, are against it. I assume they are elected??

I will follow with interest the plan as it progresses. I left my e-mail address to receive updates and look forward to hearing from you shortly.

Representation Details

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Neither							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		Neither							

3216.D1//H01 Vines, c/o Niicola Alder King 09/07/2012 E O M

Document: Deposit Plan, p.62 Site: 284/ Rear of 15 Ridgeway New Site

Policy: H01

Summary: Proposing new residential site , land to rear of 15 Ridgeway, Newport

Item Question Representation Text

14 14 Representation

I am instructed by the landowner of an area of land to the rear of 15 Ridgeway, Newport, edged red on the attached plan, to submit representations and details of the site to the current Deposit Local Development Plan consultation as a potential future residential development site. The site has an area of approximately 1.8 hectares (4.3 acres). My clients land is "Greenfield" but is located immediately adjacent to the settlement boundary and has good links with the wider urban area. The site is very well located in relation to the settlement and is within a reasonable walking/cycling distance from existing local facilities and employment opportunities. There are bus stops along Ridgeway providing regular services to the City Centre and railway station. The site is also readily accessible to the M4 motorway to the west via the B4591. This is therefore a highly sustainable location. Additionally, we are not aware of any site specific, technical or infrastructure constraints that would inhibit or unduly constrain development. Furthermore there are no landscape designations or safeguards on the site. The surrounding area is predominantly residential in character, with various local facilities including a primary school and convenience shops in close proximity. Residential development would therefore be appropriate in this location. Although being located outside of the development boundary there is other development in the surrounding vicinity including a riding school directly to the north west of the site. The M4 motorway provides containment to growth along this north western edge of the City and it is therefore considered that this location would be a suitable area for future expansion of the urban area. The settlement boundary should be reviewed with a view to amending it in this location in the long term to include this area and allow for its development in the future. My client would like to promote this land for residential development in the period to 2026 and beyond and would appreciate an acknowledgment of this letter and acknowledgement that the land will be noted as available and suitable in any upcoming Call for Sites / SHLAA process and as a formal representation to the Deposit Local Development Plan. As summarised above, the land is available, well related to the settlement and to employment and community facilities. Residential development would be appropriate in this location and fit with the surrounding context. Although we acknowledge that adequate housing land has been identified to 2 meet the LDP's current housing requirements, we consider that this site has potential as a long term housing site should additional land be required towards the end of the current plan period or in the next plan period. I would be grateful if you could keep me informed of progress of the Local Development Plan as well as other emerging planning policy documents, especially where there are opportunities for submitting representations and promoting sites for development. If you require any further details in relation to this site in order to consider it as a potential housing site then please do not hesitate to contact me.

Additional Information Submitted - Available on Request

15 15	Do you want to speak at Public Examination?		Neither							
<i>Item Question Soundness Test</i>										
1 1	I think the LDP is sound.		Neither							

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3217.D1//CF01	NCC			09/06/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.100

Policy: CF01

Summary: Wants open space adjacent Llanmartin School and land to rear of Waltwood Road as recreational grounds

Item Question Representation Text

14 14 Representation

following the meeting on Thursday can I make some additional comments concerning land use in Underwood.

Both areas which are

a) Land adjacent to Llanmartin primary school currently football and cycle speedway track and recreation .

b) Land at the rear of Waltwood road ,adjacent to the leisure centre, currently being used for recreational and play areas and team sports and football.

As these areas are being used for leisure purposes the removal of these areas would have a detrimental effect on the health ,emotional and social well being of the people of Underwood and the wider area .I would hope that both these areas are reconsidered and protected in the LDP and removed as potential development land.Whilst recognising the needs for housing land,it would be far more beneficial to allocate a simular amount land lost by removing the above areas to an area beyond the land currently leased by BCC for football and cycleway,would make better sense and allow improvements to roads and infrastructure without losing invaluable recreational land

Hope this is considered as part of the process

kind regards and thanks once again for your efforts in Underwood.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3217.D2/W1	NCC			09/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.113

Site: 424/ South of Llanwern Steelworks

Delete Site

Policy: W1

Map: Constraints Plan - East

Summary: Objects to Llanwern waste allocation in the LDP

Item	Question	Representation Text	Soundness Test
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14	14	Representation	
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I would like to make the following points on the LDP.

Overall officers have put forward a robust plan but I have major reservations on the following:

RE the travellers sites proposed at Nash. It seems these sites contradict WG guidance on areas of flood risk and to place vans or development on these sites would be unlawful and at present un-insurable.

This aside the areas chosen in the Nash neither benefit from highways ,footways lighting access to facilities such as bus routes doctors or general infrastructure.

Re the Waste allocation sites there seems to be several contradictions.

GP2 General Development Principles – General "...there will not be significant adverse effect on local amenity ... including ... noiseodours, and air quality". (p 38) A waste site near the sssi is bound to have e an impact on local amenities of the local community and again the plan contradicts itself on GP5 General Development Principles – Natural Environment "...proposals [have] ...no significant adverse effects on areas of nature conservation interest including international, European, national... and local protected habitats and species ... (page 40) the Llanwern proposal is too close to significant and special site.

Proposals that are likely to have a significant effect upon the European sites will be considered contrary to the ethos of the Plan" (Para 3.22 - page 41),and of a waste site will have an impact on a Ramsar site and a sssi site and therefore the waste allocation site at Llanwern should be removed from the plan.

"Development in the countryside should only be permitted where the use is appropriate in the countryside, respects and enhances the landscape character and bio-diversity of the of the immediate and surrounding area of the immediate and surrounding area and is appropriate in scale and design. (p18) I cannot see how having a waste site enhances or respects the landscape or character of the area proposed.

"Development should be directed away from areas where flood risk is identified as a constraint" (page 16)This is key as properties in the area are at significant risk from flooding an waste treatment or use site would be a risk to the bio-diversity of the area in the event of flood.

It would be beneficial to reconsider the above fully prior to approving at full council.

15	15	Do you want to speak at Public Examination?	Neither
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Not Ticked

Item	Question	Soundness Test
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1	1	I think the LDP is sound.	Neither
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Not Ticked

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3217.D3//H15.02	NCC			04/06/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.71		Site: 414/ Queensway Meadows	Delete Site							
Policy: H15.02		Map: Constraints Plan - East								
Summary: Objects to Gypsy and Traveller sites in Nash										

Item Question Representation Text

14 14 Representation
 RE the travellers sites proposed at Nash. It seems these sites contradict WG guidance on areas of flood risk and to place vans or development on these sites would be unlawful and at present un-insurable.
 This aside the areas chosen in the Nash neither benefit from highways ,footways lighting access to facilities such as bus routes doctors or general infrastructure.

15 15 Do you want to speak at Public Examination?
 Not Ticked
 Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
 Not Ticked
 Neither

3217.D4//H16.02	NCC			04/06/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.72		Site: 415/ Former Army Barracks	Delete Site							
Policy: H16.02		Map: Constraints Plan - East								
Summary: Objects to Gypsy and Traveller sites in Nash area										

Item Question Representation Text

14 14 Representation
 RE the travellers sites proposed at Nash. It seems these sites contradict WG guidance on areas of flood risk and to place vans or development on these sites would be unlawful and at present un-insurable.
 This aside the areas chosen in the Nash neither benefit from highways ,footways lighting access to facilities such as bus routes doctors or general infrastructure.

15 15 Do you want to speak at Public Examination?
 Not Ticked
 Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
 Not Ticked
 Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3217.D5//H16.03	NCC			06/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Map: Constraints Plan - East

Summary: Objects to Gypsy and Traveller site in Nash area

Item Question Representation Text

14 14 Representation

RE the travellers sites proposed at Nash. It seems these sites contradict WG guidance on areas of flood risk and to place vans or development on these sites would be unlawful and at present un-insurable.
This aside the areas chosen in the Nash neither benefit from highways ,footways lighting access to facilities such as bus routes doctors or general infrastructure.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3218.D1//H01.49	Brown, Mr Martin			31/05/2012	<input type="checkbox"/>	W	O		M	
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Document: Deposit Plan, p.64

Site: 410/ Mill Street

Delete Site

Policy: H01.49

Summary: Objection to proposed site H49 Mill Street Caerleon

Item	Question	Representation Text	Soundness Test	Tick-box reply
5	5	Inset Plan(s) Caerleon		Yes
11	11	Site Name H49		
12	12	Site Reference H49		
14	14	Representation The proposed site H49 is unsuitable for development unless there are significant changes to access to the site and surrounding infrastructure. Caerleon is blighted by traffic problems which are totally ignored in the Development Plan. the village cannot cope with current traffic volumes nor can it accommodate parking requirements for residents without parking or with more than 1 vehicle. Access to the proposed site is via Cambria close which is used as overspill parking for many village residents. This has resulted in very dangerous parking at the junction with Mill Street. Any development of this site would add to the vehicle movements in and out of Cambria close, presenting additional risk to drivers and pedestrians. This is the last undeveloped space in Caerleon centre and would be more suitable for retention as a leisure space. Access off Cambria Close to the site itself is very narrow and unsuitable for use as the main point of entry. There should be no further development within the Caerleon inset area until there are major improvements to roads and parking, taking account of provision for pedestrians, cyclists and tourist traffic.		
15	15	Do you want to speak at Public Examination?		No
1	1	I think the LDP is sound.		No
13	13	Test of Soundness Fails to address the strong community views on further development within Caerleon		
10	10	Delete an existing site.		Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3219.D1//H15.02	Carlsberg UK Ltd			08/06/2012	<input type="checkbox"/>	W	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

[Delete Site](#)

Policy: H15.02

Summary: Objection to a Gypsy and Traveller Transit site at Queensway Meadows.

Item Question *Representation Text*

2 2 Policy Number
H15

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Carlsberg UK has operated the Nash Mead Depot in Newport since 1993. The Depot employs 78 people and its operation is critical to the supply of Carlsberg UK's products and wholesale operations to the South Wales and Southern England retail and public house markets – covering an area which extends from Pembroke Dock to Swindon.

Typically there are 24,000 metal containers stored at the Depot with 10,000 of these empty at any time. In addition, there are 20,000 cases of products, predominantly for the retail market, equating to about 385 tonnes. The nature of the operation means that the Depot is served by a large number of HGVs, with, on average 80 vehicular movements to and from the site each day and access to the site controlled.

In order to remain competitive in a challenging UK beer market, Carlsberg has undertaken a wholesale review of its UK operations in the last three years in order to bring greater control of costs and to maximise efficiently. This review resulted in the closure of the Leeds Brewery in 2011 in favour of investment into the company's remaining brewery in Northampton and key investment and concentration on its 12 core logistics that serve the United Kingdom, including the Nash Mead Depot, Newport.

It is critical to the business that the depots are able to operate effectively, as any significant constraints on their activity detrimentally affect the future effective operation of Carlsberg's UK business as a whole/ it is against this background that serious concern is raised regarding the proposed allocation of land adjacent to the Nash Mead Depot at Queensway Meadows as 'Gypsy and Traveller Transit Accommodation'.

Objection to draft Policy H15

Carlsberg's concerns are that the proposed allocation of the 'Queensway Meadows' site is not founded on a comprehensive and credible evidence base; that the likely impacts arising from the creation of a 'Transit site' in this location have not been given adequate consideration and that there is insubstantial and sequentially preferable locations. Accordingly, the proposed allocation of Queensway Meadows' as a site for 'Gypsy and Traveller Transit Accommodation' under draft Policy H15 is considered unsound.

It is acknowledged that, as part of meeting housing needs, there is a statutory duty for Newport City Council to ensure that the needs of Gypsies and Travellers are catered for. In support of National planning policy contained in Planning Policy Wales (2011), Welsh Assembly Circular 30/2007 – 'Planning for Gypsy and Traveller Caravan Sites' (2007) states that 'where there is an assessment of unmet need for Gypsy and Traveller accommodation in the area, local planning authorities should allocate sufficient sites in LDP's to ensure that the identifies pitch requirements for residential and transit use can be met', with paragraphs 17-24 of the Circular setting out planning policy guidance on how sites should be identified for allocation.

Whilst it is clearly wrong to classify Gypsies and Travellers as being an analogous community and to imply that this community has certain norms of behaviour, it is not irrelevant to consider the public perception of the nomadic lifestyle of Gypsies and Travellers. Concern is expressed that land at Queensway Meadows is located 'out of the way' from existing residential community in a location which does not benefit from access to a number goods, services and uses required by residential communities and thus would serve to isolate 'gypsies and travellers' from the rest of the population, against the aims of Circular 30/2007 and Planning Policy Wales. Additionally the location is on land identified as being 'at risk of flooding' as defined by the Environment Agency, where Planning Policy Wales identifies 'vulnerable development' such as this should not normally be located.

Although residential and industrial uses should not strictly be seen as incompatible uses, it is difficult to envisage the City Council allocating housing within a large industrial estate (on land currently allocated for employment use), with the negative externalities of noise and heavy traffic associated with industrial activity.

Although there has been no formal consultation on the selection of Gypsy and Traveller sites up to this point, having now viewed the site suitability pro-forma used by the Council to identify the three permanent and two transit Gypsy and Traveller sites in the Deposit Local Development Plan, it is a concern that these are incomplete, with very limited information used to inform the decision as to which sites should be identified for allocation, particularly as the Council's website states that 20 sites 'complied with the WG government criteria'.

Circular 30/2007 considers that the site sustainability issues are critical to the selection of sites for gypsy accommodation. It states that site sustainability 'should not only be considered in terms of transport mode, pedestrian access, safety and distances from services' and identifies a whole raft of matters that could be considered, which do not appear to have not been assessed by the Council, including access to GPs and other health services, access to safe play areas and the opportunity to promote peaceful and integrated co-existence between the site and the local community.

Although access and flood risk are identified on the pro-forma for Queensway Meadows as issues that need addressing, there is no evidence of any Highways Assessment or Flood Consequences Assessment having been completed to demonstrate that the impacts are acceptable or can be adequately mitigated. Indeed, the relevant summary for the site on the comparative assessment schedule on the Council's website only refers to a need to provide 'adequate screening from commercial businesses for the potential residents'.

Representation Details

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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The pro-forma does consider whether the site in question 'would be considered for residential use' with reference to Welsh Assembly Government Guidance which considers that 'if a site is not suitable for residential use it is not suitable for a Gypsy and Traveller site.' However, there is no explanation as to why this site, within an industrial estate, allocated for employment use and subject to flooding, is considered to be acceptable on this basis.

As well as the above issues, Carlsberg has legitimate concerns regarding the impact of the 'Transit site' on the operation of the adjacent Depot, particularly with respect to highway and security matters, which do not appear to have been considered at all.

It is understood that the transit site will be a 'gated facilities' with gypsies and travellers required to book ahead in order to stay at this site. Whilst this is clearly necessary to regulate access, it does lead to potential highway issues from vehicles queuing to enter the site from a new access to the North East blocking the highway. Furthermore, it is clearly a concern that some gypsies and travellers may not book ahead and so cannot enter the facility but may follow others to the site and 'park up' on the nearby roads when they are refused access. Any obstruction of the roads required to access the Depot site would severely impact its effective operation. In addition, the introduction of families with young children adjacent to a road with heavy HGV traffic raises obvious questions regarding highway safety, with no evidence provided as to whether this has been considered by the Council.

In addition to highway concerns, safety and security issues are clearly critical to the operation of a Depot. The introduction of a transitory residential community adjacent to the Depot raises legitimate concerns regarding security' particularly given the empty metal containers on-site have an estimated scrap metal value of £700,000.

Recently on the advice of Northamptonshire Police, Carlsberg has undertaken additional security measures for its Brackmills Depot in Northampton, in order to increase security of empty metal containers stored on the site whilst there has been an illegal gypsy and traveller camp nearby.

During the decommissioning of Carlsberg's Leeds brewery, security staff also had to undertake special measures with respect to the secure removal of metal containers from the site following a number of informal approaches and offers of money 'to turn a blind eye' to unauthorised removal of the metal material.

Based on the above examples and similar experiences at Carlsberg's depots at Kimnel Park in Rhyll, London Docklands, NDC in Northampton and previously at the Nash Mead site, Carlsberg has deemed it necessary to plan for additional security measures not required on other depot sites in the event that the Queensway Meadows is allocated as a 'Transit site'. These additional security measures would be at significant cost to the business.

In the absence of a thorough and detailed assessment of the sites considered for allocation for Gypsy and Traveller accommodation, including an assessment of the impacts to and from adjacent activities, or any clear rationale as to how the sites proposed for allocation have been selected, it is considered that there is not a robust and credible evidence base to justify the Council's proposed allocation of Queensway Meadows for 'Gypsy and Traveller Transit Accommodation'. Accordingly draft Policy H15 is considered to be unsound.

These representations have raised serious concerns that the potential effects of allocating Gypsy and Traveller accommodation have not been fully considered and that allocation of Queensway Meadows as a site for 'Gypsy and Traveller Transit Accommodation' is not justified as it is not founded on a comprehensive and credible evidence base.

It is considered that the Policy H15 as it stands is not sound on this basis and that more thorough and detailed assessment of potential sites needs to be prepared, with clear rationale provided for the selection of sites for 'Gypsy and Traveller Transit Accommodation' in the Local Development Plan under a revised draft Policy H15, which considers the following criteria:

Avoidance of areas at high risk flooding, including functional floodplains.

The promotion of peaceful and integrated co-existence between the site and the local community.

Highway impacts and highway safety.

Access to goods and services.

Access to GPs and other health services.

Access to suitable safe play areas.

15	15	Do you want to speak at Public Examination?	Yes
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16	16	Subject to speak on at Examination	
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As facts and matters of expert opinion are in dispute it may be necessary to require thorough examination and clarification of these issues by expert witnesses before the Inspector.

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3220.D11//SP07	Matthews, Mr Jon	Carolyn Jones Planning Services		08/06/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.19

Site: 375/ Land at Bakery Lane

Boundary Change

Policy: SP07

Map: Constraints Plan - West

Summary: Objects to allocation as Green Wedge

Item	Question	Representation Text	Soundness Test
2	2	Policy Number SP7	
3	3	Paragraph or section number(s) 2.29	
4	4	The Proposals Map	Yes
9	9	Amend the boundaries of an existing site.	Yes
14	14	Representation POLICY SP7 identifies Green Wedges the aim of which is to prevent coalescence between settlements. Within these areas development which prejudices the open nature of the land will not be permitted. SP7 (i) identifies a Green Wedge between Newport and Cardiff. The principle of protecting this area is supported and this objective is reinforced by Policy SP6 which defines a Green Belt to the West of Marshfield and Castleton and the Newport / Cardiff boundary. However, the area indentified under these two designations is extensive and it is considered that not all sites are either needed or worthy of inclusion within the designated areas and could be coalescence between the two cities of Newport and Cardiff. In this respect we consider that an area of land at Bakery Lane, Castleton is suitable for development and is well related to the existing built up area, rather than the wider countryside. As such, it is considered that the site should be excluded from the Green Wedge (and Special Landscape Area) and be included within the Settlement Boundary for Castleton. The site is to the North of Bakery Lane and is contained by existing residential development on three sides. The forth (northern) boundary is defined by a row of mature conifers. With these strong defensible boundaries the site relates more to the existing built up area of the village than to the open grazing fields to the north-east. Proposed Changes The site should be excluded from the designated Green Wedge under Policy SP7(i) and the Proposal Map should be amended accordingly.	
Additional Information Submitted - Available on Request			
15	15	Do you want to speak at Public Examination?	Yes
1	1	I think the LDP is sound.	No

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3220.D2//SP05	Matthews, Mr Jon	Carolyn Jones Planning Services		08/06/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.18

Site: 376/ Land at Bakery Lane

Boundary Change

Policy: SP05

Map: Constraints Plan - West

Summary: Wants allocation of site as Countryside in LDP deleted.

Item Question Representation Text

2 2 Policy Number
SP5 Countryside

3 3 Paragraph or section number(s)
2.25-2.26

4 4 The Proposals Map Yes

11 11 Site Name
Bakery Lane, Castleton

14 14 Representation

Policy SP5 aims to protect the countryside surrounding the city. Extensive areas of countryside are identified on the Proposals Map, including an area to the north and east of Castleton.

The principle of protecting the countryside is supported and accepted but it is considered that the extent of the countryside designations is excessive. There are areas on the fringes of the built up area which are better related to the existing settlement pattern and can be suitable for development.

One such area is land at Bakery Lane, Castleton. This area which extends to xx hectares has existing residential development on three sides and a strong defensible boundary of mature trees on the fourth side. It therefore forms a logical extension to the village. Consequently, it is considered that the countryside designation should be deleted from Proposals Map.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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3220.D3//SP08	Matthews, Mr Jon	Carolyn Jones Planning Services		08/06/2012	<input type="checkbox"/>	P	O		M	
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Document: Deposit Plan, p.20

Site: 456/ Land at Bakery Lane

Boundary Change

Policy: SP08

Map: Constraints Plan - West

Summary: Delete Special Landscape allocation from LDP

Item Question Representation Text

2 2 Policy Number
SP8

3 3 Paragraph or section number(s)
2.30-2.32

4 4 The Proposals Map Yes

9 9 Amend the boundaries of an existing site. Yes

11 11 Site Name
bakery Lane, Castleton

14 14 Representation

Policy SP8 designated seven special Landscape Areas throughout the City boundaries. One of these is at the Wentlooge Levels. Whilst priority within SLA's is given landscape conservation development is not precluded. Any development is however required to respect the valued characteristics of the recognised landscape.

SP8 (iii) included land at Bakery Lane, Castleton. Whilst the need protect the special characteristics of the Wentlooge Levels is recognised and supported in principle, the identified site make no contribution to the broader landscape of the Levels. The site is surrounded on three sides by existing established residential development and the fourth northern boundary has a line of natural conifer trees. As a result the site is much more related to the village than the countryside to the northeast. It certainly has no relationship to the wider Wentlooge levels. As such the site should be removed from the SLA designation under Policy SP8 (iii) and the Proposals Map should be amended accordingly.

Additional Information Submitted - Available on Request

15 15 Do you want to speak at Public Examination? Yes

Item Question Soundness Test

1 1 I think the LDP is sound. No

13 13 Test of Soundness
CE2

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3220.D4//H01	Matthews, Mr Jon	Carolyn Jones Planning Services		08/06/2012	<input type="checkbox"/>	P	O		M	

SA/SEA submitted

Document: Deposit Plan, p.62

Site: 325/ Bakery Lane

New Site

Policy: H01

Map: Constraints Plan - West

Summary: Allocate land as housing allocation on Bakery Lane, Castleton

Item Question Representation Text

2 2 Policy Number
H1

3 3 Paragraph or section number(s)
Section 05

4 4 The Proposals Map Yes

5 5 Inset Plan(s) Yes

11 11 Site Name
Bakery Lane, Castleton

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14	14	Representation								
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Policy H1 deals with the Housing provision for the City over the plan period. This includes currently committed sites, sites under construction and new sites. The Plan also recognises that small sites and infill and windfall sites will also make a contribution to the housing land supply during the plan period.

Nine new residential allocations are proposed, allocating 2775 units to be built by April 2026. However, the bulk of these units are to be provided on previously developed brownfield sites within the main urban area. Whilst the principle of concentrating development on sustainable brownfield land is accepted and supported, it is considered that this strategy is somewhat limited and does not provide the range and choice of sites which homebuyers could reasonably expect. In addition, the distribution of the allocated residential sites is not evenly spread throughout the City area. The bulk of the housing sites are located to the east of the river (The Former Alcan site at Rogerstone is an exception but is a major brownfield allocation for 700 units). In light of light, consideration should be given to revising the spread and distribution of new sites and to allocating suitable greenfields sites to counter-balance the dominance of brownfield sites.

To meet this suggested amendment it is advanced that a site at Bakery Lane, Castleton should be allocated for residential development. Some of the merits of the site are detailed below but overall it is considered that the allocation of this site for residential development would provide for a small scale development immediately adjacent to the built up area of Castleton to the west of the city in an area which is popular with home buyers.

The Site

The subject site, whilst being laid to grass, is surrounded on 3 sides by existing residential development. Beyond the north – eastern boundary there is open grazing land but the site is divorced from that land due to strong defensible boundary along this part of the site which is formed by a row of conifer trees. The site is, as a consequence, better related to the existing settlement pattern than the various other sites on the fringes of Castleton and Marshfield. The site could therefore be successfully developed without prejudicing the overall objectives of the Plan. On particular, the Green Wedge and Special Landscape Area policies would not be compromised.

Evidence in support of the proposed allocation

Castleton and Marshfield are popular residential villages to the west of Newport. Over recent years both have seen new residential development. The villages remain separate entities and coalescence has been avoided. Allocation of the subject site would not affect this.

Both Castleton and Marshfield offer a wide range of facilities within reasonable walking distance. This includes a school, shops, PFS, churches, playing fields, public right of way, village hall, pubs and post office. Public transport (bus) links are available through the village with additional services from Castleton. The site is therefore well scored in terms of sustainability criteria.

The physical characteristics of the site ensure the site is well related to the existing settlement pattern. There is existing residential development on three sides. Some of these properties are very extensive residential complexes which lie outside the current settlement limits. These and the other residential properties along Bakery Lane and along Marshfield Road frame the subject site making it eminently suitable as a new residential site.

As can be seen from the attached photographs the northern boundary of the subject site is formed by a row of dense, mature, conifer trees which separate the site from the open countryside beyond. This further reinforces the suitability of the site for residential development.

The site can be easily accessed. Bakery Lane is a narrow private lane which allows for access to existing properties along the lane. The owner of the subject site has however retained control over additional land within the curtilage of the Coach House & Green View to allow for the widening of Bakery Lane and to enable the required visibility splay to be created. The proposed access improvements are detailed on the enclosed Drawing No CJP1203:04. Clearly therefore a suitable access to the required standard can be provided.

In conclusion, it is considered that the Bakery Lane site is a site suitable for small scale residential development and would provide an attractive form of residential development in an area popular with prospective purchasers. The site would add the range and choice of sites allocated within the LDP.

Proposed Changes

The Bakery Lane site at Castleton should be allocated for residential development for approximately 10 dwellings.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Additional Information Submitted - Available on Request										
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15 15	Do you want to speak at Public Examination? For full debate.									
<hr/>										
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.							No		
<hr/>										
13 13	Test of Soundness CE2									
<hr/>										
<i>Item Question</i>								<i>Tick-box reply</i>		
8 8	Add a new site.									
<hr/>										

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3221.D1//H13	Winston, Mr & Mrs Sue & R.P.			14/06/2012	<input type="checkbox"/>	E	O		M	

Document:Deposit Plan, p.71

Policy: H13

Summary: Objects to percentage limit on extensions in the Countryside

Item Question *Representation Text*

2 2 Policy Number
H13

14 14 Representation

We wish to make a representation regarding policy H13 – Extensions to Dwellings in the Countryside (Newport Structural Plan 2011 – 2026).

We note that in policy H13 Newport proposes to allow extensions of not more than 30% of the original dwelling.

We are very much in favour of preventing urbanisation of the countryside – However, we think that using such a strict, fixed % limit is too restrictive and it would be preferable to be a little more flexible. The strictest % could perhaps, be reserved for Green belt/ wedge areas.

We note that various other authorities (including Monmouthshire, Guildford, Congleton and South Bucks) have more flexibility in their policies for 'extensions to countryside dwellings' and refer to the need for extensions to be 'subordinate to the existing building', but even in Green belts some allow extensions up to 50%. Some authorities do not state a maximum %, preferring to merely state that 'extensions outside settlements should not result in disproportionate additions, taking into account the original building'.

We would suggest that the principal consideration should be that the proposed extension should not be disproportionate to the original building and should be in keeping with the character & size of nearby properties - rather than a fixed % with no leeway for individual cases. There should be allowance for where extensions would have no detrimental impact on surrounding countryside.

15 15 Do you want to speak at Public Examination?

No

Item Question *Soundness Test*

1 1 I think the LDP is sound.
Not Ticked

Neither

Item Question

6 6 A new policy

Tick-box reply

Yes

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3221.D2	Winston, Mr & Mrs Sue & R.P.			14/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.0

Site: 363/ Bishton Village

Boundary Change

Map: Inset 8: Bishton Village Boundary

Summary: Wants property included within Bishton Village boundary.

Item Question Representation Text

4 4	The Proposals Map	Yes
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11 11	Site Name	
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We did not submit the site as a candidate site.

14 14	Representation	
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We own the property known as 'Copsford' in the village of Bishton. Our house was built in 1939 and had always been included within the Bishton settlement boundary.

However, it was taken out of the village curtilage, either by design or by mistake, when the current Unitary Development Plan for Newport came into force. We realise that NCC were not legally obliged to inform us of this change, but, consequently, we were unaware of it until after the current UDP was agreed.

It seems rather illogical to us that our property is the only one on the 'main street' of the village to be excluded from the settlement boundary. Even dwellings built at the rear of other properties are included.

We would be grateful, therefore, if you could consider re-instating our house within the Bishton settlement boundary, in the Emerging Local Development Plan for Newport.

Please find below a map showing the curtilage of 'Copsford', outlined in red.

Additional Information Submitted - Available on Request

15 15	Do you want to speak at Public Examination?	No
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Item Question Soundness Test

1 1	I think the LDP is sound.	Neither
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Not Ticked

Item Question

Tick-box reply

8 8	Add a new site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3239.D1//CF15	NCC			11/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.108

Policy: CF15

Summary: Confirmed school sites proposed in relation to various developments

Item Question Representation Text

14 14 Representation

Gallagher's development - Llanwern Village - will include a new primary school
 St Modwen estate - eastern expansion area - will have two new primary schools one adjacent to the current Glan Llyn development on the west of this site and one on the east of this site in future years
 Alcan / Novellis site - Rogerstone - the developer has included provision for a new primary school
 Tredegar Park masterplan - I note pink (Education) spaces, and am unsure of the context for this development at this stage of planning
 Percoed Reen - can you confirm the Education label is being retained on this plot for future years?

15 15 Do you want to speak at Public Examination?
 Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
 Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3240.D1//H01	Pulis, Mr			12/06/2012	<input type="checkbox"/>	P	O		M	
Document: Deposit Plan, p.62		Site: 366/ Redwick Village					Boundary Change			
Policy: H01		Map: Inset 7: Redwick Village Boundary								
Summary: Change Redwick boundary to allow infill development										

Item Question Representation Text

14 14 Representation

The Redwick village boundary, as it stands, is inappropriate as it does not reflect what is perceived to be the village of Redwick by the residents, i.e. the dwellings The Haven, Fair Winds and Corner House are considered to be outside the village, when they are in fact, far closer to the centre of the village than properties to the north of the plan, namely Laurel House and Daycroft Cottage, which for some peculiar reason, are considered to be in the village.

Currently the eastern village boundary lies on the land east of the reën which runs adjacent to Green Court Cottage. I object to the proposal to move it west of this reën.

The result of this proposed boundary change impacts significantly on the potential commercial value of my land, as it is intention to shortly seek planning permission for the erection of four detached houses as infill. As you will see from the map, my land is encompassed on three sides with domestic dwellings.

I wish to draw to your attention that there is no opportunity to develop property within the village to allow former villagers to return with their families, as my own children and grandchildren would wish.

A small number of new houses would not significantly affect the character of the village if they are sympathetically developed within the local environment and this would not impact on the sustainability of the village. I feel that the village boundary needs to be extended rather than contracted, to promote further controlled development.

Currently a new village hall is under development funded by the Big Lottery (£300K) and Welsh Assembly Government (£200K). Surely with the amount being spent on this project the aim should be to maintain and develop the village community and not further constrict the boundaries and thus prevent any future newcomers to the village!

I understand the Welsh Assembly Government (WAG) has granted planning permission for a large development on the former Llanwern Steelworks site. The land at Llanwern lies lower than that of Redwick and does not benefit from the management of the Caldicot and Wentlooge Water Board. We understand that to satisfy WAG the developers have agreed to incorporate large lakes to accommodate any flood risk. Obviously lakes are full of water already so where does any flood water go? You will no doubt be aware, that recent work has been undertaken to improve the sea wall east of the River Usk to the standard that currently exists at Redwick, which has not been flooded for over 400 years. I note that following the work undertaken east of the Usk, you now consider to be suitable as a candidate site for planning.

Additionally, planning permission has been granted, on appeal, to Llanover Estates at the former Tredegar Park Golf Club. Again, this land does not benefit from the same protection to that at Redwick.

15 15 Do you want to speak at Public Examination?
Not Ticked

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.
Not Ticked

Neither

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3241.D1//H15.01 C	Boschen, Miss Helen			14/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.71

Site: 428/ Pound Hill

[Delete Site](#)

Policy: H15.01 Coedkernew

Summary: Objects to Policy H15 of the LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

I object to the proposed use of Allocations H15, H16 and H17 (Newport LDP) for gypsy/traveller sites for the following reasons :-

A Health and well being of gypsy/ travellers living on the site may be affected by:-

1.Close proximity of pylons and power lines

2. Traffic noise and pollution- road safety for children.

The road is busy, much of the traffic using it is heavy - articulated lorries, tractors, oil tankers etc. It appears to go between two of the sites thus increasing the risk of accident caused by/ to straying animals or individuals (esp children)

3 . There is neither mains drainage nor gas available in the area.

4. Two of the sites are in or very near the projected expansion route for the M4 - if this is developed the families would - again- be forced to move. 5. As detailed in the open meeting in the village hall the current site (without planning permission) on Queensway meadows has attracted others who have threatened the travellers in that enclosure and caused a fracas in the road.

B Equality and fairness

6. The proposed sites are outside the settlement lines - as I understand it development by private individuals is not allowed/ severely restricted. Granting of special permission to allow development for such a site is not fair to local residents, particularly those who have applied for permission to develop and been refused - and will not be conducive to development of good relationship between communities. 7. There are additional caravans and livestock (governed by movement orders etc I hope, as this would only be fair!) at the side of the road by the site (without planning permission) on Queensway Meadows, these are owned by people who weren't allowed into the managed site. Some of the wooden posts originally erected by the city council to stop these illegal sites have had to be uprooted to get the caravans in. There is a concern that the proposed sites would give rise to other illegal roadside sites (trespass on farming land and other associated vandalism and flytipping). I stress this is not a racist view, but one based on observation and factual evidence. This is an outcome of the managed site, tolerated by Newport City Council as a investigation and social experiment- this outcome would not be fair to local residents or the Travellers sites in H17 etc equally (see point 5).

C Local history/ natural history/ bird sanctuary/ wildlife

8. The effect of these developments would be quite disastrous for local wildlife (remembering that the area is an area of SSI and the home of badgers, otters, water voles and greater crested newts - all protected species.)

9.Although the temporary travellers' site on Queensway Meadows appears quite well managed and tidy (and do not have planning permission) it has attracted two different satellite sites resulting in unsightly destruction and damage. See point 7. 10. Changes to the road system to accommodate the sites- paving, sleeping policemen, lighting and other associated street furniture and restrictions which are not in keeping with the rural aesthetic. All these changes are in the Welsh Assembly Gov pack for Traveller site requirements and would cause severe change if implemented.

D Danger of flooding

11. Living on a flood plain we have become increasingly aware of the danger of flooding and recently have had telephone warnings about potential flooding. It seems unfair to potential occupiers to deliberately choose to put a site for single storey dwellings in such a place.

I understand that there is a set of recommendations/guidelines prepared by the Welsh Assembly regarding the sites for gypsy/travellers. I also understand that the Allocations cited in my introductory sentence do not meet these recommendations/guidelines.

I urge you - in the interest of openness and fairness to all, to review the evidence and find the best place for the gypsy/ traveller sites .

Please advise me of open meetings when this matter will be discussed. Please send me a mail upon receipt of this objection.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Neither							
	Not Ticked									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		Neither							
	Not Ticked									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3241.D2//H15.02	Boschen, Miss Helen			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

[Delete Site](#)

Policy: H15.02

Summary: Objects to Policy H15 of the LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

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3 . There is neither mains drainage nor gas available in the area.

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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Neither							
	Not Ticked									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		Neither							
	Not Ticked									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3241.D3//H16.01	Boschen, Miss Helen			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 407/ Yew Tree Cottage

Delete Site

Policy: H16.01

Summary: Delete Policy H16 of the LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Neither							
	Not Ticked									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		Neither							
	Not Ticked									

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3241.D4//H16.02	Boschen, Miss Helen			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

[Delete Site](#)

Policy: H16.02

Summary: Objects to Policy H16 of the LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Neither							
	Not Ticked									
<i>Item Question</i>	<i>Soundness Test</i>									
1 1	I think the LDP is sound.		Neither							
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3241.D5//H16.03	Boschen, Miss Helen			14/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

[Delete Site](#)

Policy: H16.03

Summary: Objects to Policy H16 of the LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Neither							
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3241.D6//H17	Boschen, Miss Helen			14/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objects to Policy H17 of the LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

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

Newport City Council Local Development Plan

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
15 15	Do you want to speak at Public Examination?		Neither							
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1 1	I think the LDP is sound.		Neither							
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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3242.D11/Objectiv	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Policy: Objective 2

Summary: Include Air Quality within climate change.

Item Question Representation Text

14	14	Representation								
<p>Newport Local Development Plan 2011-2026 Deposit Plan Representations by Environmental Health – May 2012 Air Quality Environmental Health feel it is essential that the Council includes its commitment to improving Air Quality within the LDP as currently it makes little reference to it, particularly within its Sustainability, Objectives and Strategic Policy sections. Improving air quality in Newport is a statutory requirement and is therefore a priority objective for Environmental Health, and the Council. Climate Change and its potential impact appears well represented within the Deposit Plan although Environmental Health consider the impacts of air quality are equally important, given its impacts have severe public health implications and are arguably more tangible than those attributed to climate change particularly at a local level. To improve air quality within the authority area Environmental Health has produced an Air Quality Action Plan. The current version is in draft form but is anticipated to become a formal document during the Summer of this year. The plan details the current areas where monitoring has shown that air quality poses an unacceptable risk to health and proposes measures which when implemented will reduce air pollution and improve air quality. All areas which suffer from poor air quality do so predominantly as a result of emissions from road transport. Although there is some cross reference to air quality within Section 3 – 'General Policies' of the Deposit Plan, Environmental Health feel that given its importance in terms of public health a section should be incorporated within the other core sections of the Plan giving it similar weight and importance as the climate change objectives. Therefore it is suggested that the Deposit Plan should be revised to include 'Climate Change & Air Quality' within its core objectives section. Many of the considerations applicable to mitigating against climate change, for example sustainable design of developments and incorporating sustainable travel considerations into new development at the design stage, will also help improve local air quality. In addition to its consideration for new proposed development another key area where the incorporation of air quality is essential is Transport given that the majority of poor air quality is a result of highways emissions - Objective 8. The incorporation of air quality considerations (the wording can be provided if necessary) into the 'Strategic Policies' section, particularly SP1 Sustainability, is also required. Again there is a robust consideration of climate change in this section, many aspects of which provide substantial overlap with those related to air quality. SP2 'Health' is also an obvious strategic aim which should incorporate the Council's air quality ambitions given the well-established links between respiratory illnesses, increased mortality and poor air quality. This section current makes a tentative connection between climate change and health impacts but is lacking sufficient reference to poor air quality. Finally as the main source of poor air quality within the authority area 'SP14 Transport Proposals' should also contain greater emphasis on the benefits of improving air quality by promoting sustainable travel.</p>										
15	15	Do you want to speak at Public Examination?							Neither	
Not Ticked										

Item Question Soundness Test

1	1	I think the LDP is sound.							Neither	
Not Ticked										

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3242.D2//Objectiv	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.11

Policy: Objective 8

Summary: Air Quality should be considered as part of objective 8

Item Question Representation Text

14 14 Representation

Air Quality

Environmental Health feel it is essential that the Council includes its commitment to improving Air Quality within the LDP as currently it makes little reference to it, particularly within its Sustainability, Objectives and Strategic Policy sections. Improving air quality in Newport is a statutory requirement and is therefore a priority objective for Environmental Health, and the Council.

Climate Change and its potential impact appears well represented within the Deposit Plan although Environmental Health consider the impacts of air quality are equally important, given its impacts have severe public health implications and are arguably more tangible than those attributed to climate change particularly at a local level.

To improve air quality within the authority area Environmental Health has produced an Air Quality Action Plan. The current version is in draft form but is anticipated to become a formal document during the Summer of this year. The plan details the current areas where monitoring has shown that air quality poses an unacceptable risk to health and proposes measures which when implemented will reduce air pollution and improve air quality. All areas which suffer from poor air quality do so predominantly as a result of emissions from road transport.

Although there is some cross reference to air quality within Section 3 – 'General Policies' of the Deposit Plan, Environmental Health feel that given its importance in terms of public health a section should be incorporated within the other core sections of the Plan giving it similar weight and importance as the climate change objectives.

Therefore it is suggested that the Deposit Plan should be revised to include 'Climate Change & Air Quality' within its core objectives section. Many of the considerations applicable to mitigating against climate change, for example sustainable design of developments and incorporating sustainable travel considerations into new development at the design stage, will also help improve local air quality.

In addition to its consideration for new proposed development another key area where the incorporation of air quality is essential is Transport given that the majority of poor air quality is a result of highways emissions - Objective 8.

The incorporation of air quality considerations (the wording can be provided if necessary) into the 'Strategic Policies' section, particularly SP1 Sustainability, is also required. Again there is a robust consideration of climate change in this section, many aspects of which provide substantial overlap with those related to air quality.

SP2 'Health' is also an obvious strategic aim which should incorporate the Council's air quality ambitions given the well-established links between respiratory illnesses, increased mortality and poor air quality. This section current makes a tentative connection between climate change and health impacts but is lacking sufficient reference to poor air quality.

Finally as the main source of poor air quality within the authority area 'SP14 Transport Proposals' should also contain greater emphasis on the benefits of improving air quality by promoting sustainable travel.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3242.D3//SP01	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Air Quality should be incorporated into SP01

Item Question Representation Text

14 14 Representation

Air Quality

Environmental Health feel it is essential that the Council includes its commitment to improving Air Quality within the LDP as currently it makes little reference to it, particularly within its Sustainability, Objectives and Strategic Policy sections. Improving air quality in Newport is a statutory requirement and is therefore a priority objective for Environmental Health, and the Council.

Climate Change and its potential impact appears well represented within the Deposit Plan although Environmental Health consider the impacts of air quality are equally important, given its impacts have severe public health implications and are arguably more tangible than those attributed to climate change particularly at a local level.

To improve air quality within the authority area Environmental Health has produced an Air Quality Action Plan. The current version is in draft form but is anticipated to become a formal document during the Summer of this year. The plan details the current areas where monitoring has shown that air quality poses an unacceptable risk to health and proposes measures which when implemented will reduce air pollution and improve air quality. All areas which suffer from poor air quality do so predominantly as a result of emissions from road transport.

Although there is some cross reference to air quality within Section 3 – 'General Policies' of the Deposit Plan, Environmental Health feel that given its importance in terms of public health a section should be incorporated within the other core sections of the Plan giving it similar weight and importance as the climate change objectives.

Therefore it is suggested that the Deposit Plan should be revised to include 'Climate Change & Air Quality' within its core objectives section. Many of the considerations applicable to mitigating against climate change, for example sustainable design of developments and incorporating sustainable travel considerations into new development at the design stage, will also help improve local air quality.

In addition to its consideration for new proposed development another key area where the incorporation of air quality is essential is Transport given that the majority of poor air quality is a result of highways emissions - Objective 8.

The incorporation of air quality considerations (the wording can be provided if necessary) into the 'Strategic Policies' section, particularly SP1 Sustainability, is also required. Again there is a robust consideration of climate change in this section, many aspects of which provide substantial overlap with those related to air quality.

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3242.D4//SP02	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.16

Policy: SP02

Summary: Air Quality should be incorporated into Policy SP02

Item Question Representation Text

14 14 Representation

Air Quality

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3242.D5//Objectiv	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.9

Policy: Objective 1

Summary: Reference to contaminated land should be made in Objective 01

Item Question Representation Text

14 14 Representation

Contaminated Land

One of Environmental Health's statutory duties is the requirement to identify and assess contaminated land. An important precursor to this process is ensuring that development of brownfield sites adequately addresses historic ground contamination and to ensure each site is fit for purpose. Environmental Health have recently prepared a revised Contaminated Land Strategy document which we would encourage all stakeholder groups to consider when brownfield sites are put forward for development.

Therefore given the large amount of reference to brownfield sites within the Deposit Plan and the preference for these sites over greenfield sites for development, we would like to see more emphasis on the responsibility for developers to undertake ground assessment and remediation and therefore ensure sites are 'fit for purpose'. In addition preference for those developments which go beyond simply satisfying regulatory requirements and provide additional 'betterment' for brownfield sites should be encouraged.

The wider environmental benefits of remediating sites should also receive greater recognition within the Deposit Plan. For example, the impact of contaminated land and ground water on ecological receptors such as sensitive habitats (River Usk, Gwent Levels etc) should be mentioned.

Inclusion of additional reference to the Council's commitment to safeguarding public health and the wider environment through the requirement to assess and remediate contaminated land prior to development could be included within Objective 1 (Sustainable use of Land) and Objective 9 (Health and Well-being). In addition improved reference to this area in Strategic Policies SP1 Sustainability and SP2 Health is also required.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3242.D6//Objectiv	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Policy: Objective 9

Summary: Consideration should be given to contaminated land in Objective 9

Item Question Representation Text

14 14 Representation

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3242.D7//SP01	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.14

Policy: SP01

Summary: Consideration to contaminated land should be given in Policy SP1

Item Question Representation Text

14 14 Representation

Contaminated Land

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3242.D8//SP02	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.16

Policy: SP02

Summary: Consideration should be given to contaminated land in Policy SP2

Item Question Representation Text

14 14 Representation

Contaminated Land

One of Environmental Health's statutory duties is the requirement to identify and assess contaminated land. An important precursor to this process is ensuring that development of brownfield sites adequately addresses historic ground contamination and to ensure each site is fit for purpose. Environmental Health have recently prepared a revised Contaminated Land Strategy document which we would encourage all stakeholder groups to consider when brownfield sites are put forward for development.

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15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3242.D9//H08	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.68

Policy: H08

Summary: Proposed amendment to Policy H8

Item Question Representation Text

14 14 Representation

Houses in Multiple Occupation
Regarding Section H8 (ii) which is currently worded as:

[Proposals will only be permitted if] "THE PROPOSAL DOES NOT CREATE AN OVER CONCENTRATION OF HOUSES IN MULTIPLE OCCUPATION IN ANY ONE AREA OF THE CITY WHICH WOULD CHANGE THE CHARACTER OF THE NEIGHBOURHOOD OR CREATE AN IMBALANCE IN THE HOUSING STOCK;"

We suggest that the wording should be amended to say "...which would have a detrimental impact on the character of the neighbourhood..."

This is because not all HMOs have a detrimental impact on neighbourhoods, and some areas of Newport (either now or in the future), may benefit from a number of properties being converted into HMOs.

In order to strive to prevent a situation occurring where Planning Permission is granted, development works completed and then Environmental Health require further works, we also request the following:

"iv) the Proposals meet the standards set by Newport City Council's Houses in Multiple Occupation Licensing Scheme."

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
3242.D10//GP07	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document:Deposit Plan, p.45

Policy: GP07

Summary: Environmental Noise Directive should be considered in the LDP

Item Question Representation Text

14 14 Representation

Environmental Noise Directive – Noise Action Planning Priority Areas & Quiet Areas

In 2002 the European Commission proposed a Directive relating to the assessment and management of Environmental Noise.

The European Parliament and Council have adopted the Assessment and Management of Environmental Noise 2002/49/EC, more commonly referred to as the Environmental Noise Directive (END) whose main aim is to provide a common basis for assessing environmental noise issues across the EU and taking action to address them.

The END deals with noise from road, rail, air traffic, and from industry. It focuses on the impact of such noise on individuals, complementing existing EU legislation, which sets standards for noise emissions from specific sources.

The aim of the END is to define a common approach to environmental noise issues across the European Union. The three main objectives of the END are:

- To determine the noise exposure of the population through noise mapping.
- To make information available on environmental noise to the public.
- To establish Action Plans based on the mapping results, to reduce noise levels where necessary, and to preserve environmental noise quality where it is good.

The Directive was transposed into Welsh legislation by the National Assembly for Wales as Welsh Statutory Instrument 2006 No. 2629 (W.225) The Environmental Noise (Wales) Regulations 2006. It is a requirement of the action plans to identify quiet areas and aim to protect them against an increase in noise. The action plans state the intention to link the initial identification of quiet areas with locations of public amenity and open space identified by local authorities as being important to their local communities.

In summary, Noise Action Planning Priority Areas (NAPPAs) will aim to prevent an increase in environmental noise and reduce it if necessary in defined areas of Newport. Quiet Areas will aim to preserve environmental noise quality where it is good i.e. protect them against increase in noise.

Once an area has been designated as a Quiet Area, Planning Policy Wales requires development plan policies to have regard to the need to protect it from an increase in noise, and requires special consideration where noise-generating development is proposed nearby.

Therefore we feel that the Deposit Plan must make detailed reference to the Environmental Noise Directive. NAPPAs and Quiet Areas, once designated, will impact the nature of development that can take place and this must be reflected in the Deposit Plan.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3242.D11//GP07	Newport City Council			13/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.45

Policy: GP07

Summary: Consideration to odour creation should be included in Policy GP7

Item Question Representation Text

14 14 Representation

Comments on Section GP7.

- "Odour" should be included in the capitalised summary (can occur from A3 premises etc.).

- There should be mention of "Loss of Amenity" in addition to harm to health in the capitalised summary.

- There is mention of Planning Policy Wales, Chapter 13 in GP7 and in that document is mention of the Environmental Noise Directive but as contaminated land and air quality are specifically mentioned in the Deposit Plan, noise mapping and quiet areas should be too.

- GP7 could be improved to better reflect the amount of input EH have to protect Amenity and Public Health (e.g. noise sensitive development, noisy development, new roads etc.).

- The EA and "other regulatory bodies" are mentioned. That could imply external regulatory bodies. This should be extended to include internal (NCC) statutory consultees as EH cover the majority of the issues in the summary.

15 15 Do you want to speak at Public Examination?

Neither

Not Ticked

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Not Ticked

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3243.D1//H01	Pratt, Mr Bill	AMMRO Consulting		14/06/2012	<input type="checkbox"/>	E	O		M	
Document: Deposit Plan, p.62		Site: 340/ 19 Old Hill Crescent			Boundary Change					
Policy: H01		Map: Inset 15: Christchurch Village Boundary								
Summary: Amend village boundary of Christchurch										

Item Question Representation Text

5 5 Inset Plan(s)
No 15 Christchurch Road

9 9 Amend the boundaries of an existing site. Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

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Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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This report is to accompany the application for inclusion of Domestic Curtilage at the rear of 19 to 29 Oldhill Crescent with in the settlement boundary of Christchurch.

SITE HISTORY The development of Oldhill Crescent in Christchurch was undertaken around 1955 which can be seen from the original Plot layout drawing by Thaves Architects (see appendix A). On this plan it clearly sets out the original boundaries for each plot number, where plot number 6 corresponds to No. 19 Oldhill Crescent, plot 7 is No. 21 and so on. It is worth noting that the access created for this development is between existing properties. Also in appendix A is the original title deed of 19 Oldhill Crescent dated 1611/9 3 with the property register dated 20103196 which shows a Charge in place where the vendors of all perimeter properties notably 17 1027. bounded with the land to the West are to Keep and Maintain the hedgerow along this boundary. Inset Maps in Appendix B are of the settlement boundary of the Village of Christchurch produced for the councils development plan. Plan A (inset map 10) is from the Borough of Newport Local Plan 1991-2006, this shows the inclusion of extended domestic Curtilage's to properties 17 to 21, although this plan was never put on deposit by the Council. Plan B (inset map 15) is of the current and soon to be updated Local Plan, This also shows the inclusion of domestic Curtilage's to properties 17 & 19.

In Appendix C, are historical aerial photographs which show the cultivated area of land now designated as domestic curtilage.

CURTILAGE EVIDENCE

As this report sets out to substantiate the inclusion of Residential Curtilage into the settlement Boundary, firstly we must justify the Domestic use of the Land. The Owner, Mr Pratt, has been cultivating the land shown on the plan in Appendix D, for the past 25 years. On 24th March 2000, Newport Borough Council senior Enforcement Officer, Paula Clarke, wrote to Mr Pratt following a visit to site with Local Councillor (see appendix E). This letter confirmed the resolution passed by planning Committee that the Change of Use of Land from Agricultural to Domestic Curtilage had taken place (however this land was never designated as agricultural, see title in appendix G). There was an inclusion of extended curtilage within the settlement boundary as Shown on Inset map 15 for property numbers 17 & 19, although this did not include all of what was considered Domestic use, and reasons for this have never been issued. Subsequent site visits were undertaken in 2009 by Enforcement Officer Sophie Beny and Councillor Charles Ferris, and a letter (Appendix E) confirming their findings that the Land to the Rear and East (this should have read 'to the rear and North ') was exempt from enforcement as change of use to domestic curtilage had taken place more than 10 years ago. On the ground within this curtilage, Mr Pratt also has an allotment and some outbuildings which serves the dwelling house and is attached and forming one continuous enclosure. It was suggested by the council that Curtilage to No. 17 was included as it has a defensible boundary. hedges. This is not considered a valid argument as fencing and/or planting can be installed at any time and also removed at any time, the owner of no. 19 owns both parcels of Land and has no need to add any defensible boundaries between the two. It could therefore be suggested that both parcels are domestic curtilage and the cultivated area only represents a mowing regime as there are defensible boundaries around the two parcels combined.

CURTILAGE DEFINITION

The lawful use of a property (whatever it is) extends to the whole of the 'planning unit ' (i.e. the unit of occupation, unless or until any part of it can be identified as being physically and functionally separate

from the whole). With this one exception, the planning unit in the case of a single private dwelling house

is undoubtedly the whole of the land occupied with the house, and the lawful use of the whole of that planning unit falls within Use Class C3 in the Use Classes Order (namely use as a single private dwelling house).

Confusion can often be in relation to the concept of the domestic 'curtilage'. The first point which it is important is that the 'curtilage' (or the 'residential curtilage') of a property does not represent a use of land for planning purposes. You cannot change the use of land to use 'as residential curtilage'. If land not

19 Oldhill Crescent forming part of the original planning unit is incorporated with in that planning unit (for example, a house and the land enjoyed with it for domestic purposes). in other words if its use is changed from (say) agricultural use to domestic use, then that represents a material change of use of the land, but it makes no difference whether the area of land in question was incorporated in what can be described as the 'residential curtilage' of the house; what matters is whether it has been incorporated in the planning unit so as to change its use to domestic use. This has taken place as Permitted development rights exist by way of Allotments and outbuildings on site as shown on appendix F.

The second point to bear in mind (as you may appreciate from what I have already written above) is that the 'domestic curtilage' of a house is not necessarily co-extensive with the planning unit. This particularly applies to large houses in the countryside where the 'curtilage' may extend only to the cultivated garden, plus the forecourt immediately in front of the house, etc. However, other land within the planning unit which is not so directly related to the house may in fact fall outside the domestic curtilage. As I have pointed out above, this makes no difference in terms of the lawful use of the land. The only significance of the definition of the curtilage for planning purposes is that certain permitted development rights for operational development (outbuildings, extensions and certain other structures) apply within the curtilage of a single private dwellinghouse, but not to any land within the same planning unit which falls outside the curtilage.

Officials sometimes seem to get hung up with the definition of the 'curtilage' when considering questions of lawful use (as distinct from permitted development rights, which are an entirely separate issue), but I really must stress that this is of no relevance in relation to the lawful use of any part of the property. In the vast majority of cases, the whole of a domestic property will constitute a single planning unit, so that the lawful use of the whole of the property will be use as a single private dwellinghouse within Use Class C3 of the Use Classes Order, and this necessarily includes the whole of the land enjoyed with it for domestic purposes, whether it falls inside or outside the slightly narrower definition of 'residential curtilage'.

A small court, yard, garth, or piece of ground attached to a dwelling house, and forming one enclosure with it, or so regarded by the law; the area attached to and containing a dwelling house and its outbuildings. Domestic Curtilage is usually a garden, but: can include parking areas, access roads, vegetable plots, children's play equipment, and stables (where the horses are kept for pleasure rather than agricultural use). The domestic curtilage is not necessarily marked off or enclosed, but it should be clearly attached to the house or serving the purpose of the house in some useful and intimate way. This fact alone can cause the most confusion especially in rural areas where the site owner red edges a site of large proportions for a Planning application or a application for a Certificate of lawful

Representation Details

Newport City Council Local Development Plan

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Development.

IMPACT ON LANDSCAPE.

Given the location of the application site and the surrounding existing development and planting it is considered that there would be no adverse effect on the visual amenity and functioning of the surrounding countryside. The site is not visible from Oldhill Crescent or from the adjacent recreation ground due to the site being completely enclosed by mature trees and dense hedgerows. In this regard the only location from where the site is visible is from Trinity View, Caerleon, some 1.6 miles away. This view is also obscured by the trees and hedges, therefore inclusion of the site into the settlement boundary will not be harmful to the countryside.

SUSTAINABILITY

The site is in a sustainable location, ie walking distance to local services, such as Tesco Express (7mins), Local Pub (2 mins), Church (1 min), Post Box (2 mins), Post Office (7 mins) and bus stop (4 mins). The bus stop includes routes direct to Spytty Retail Park and Newport City Centre. This is highlighted in the PROPOSED METHODOLOGY FOR THE ASSESSMENT OF VILLAGE DEVELOPMENT BOUNDARIES FOR THE NEWPORT LOCAL DEVELOPMENT PLAN 2011 -2026, point 3 and 4.

19 Oldhill Crescent

Planning Policy Wales (2011) -see para 4.8.2 and Figure 4.1 means that all garden land is Previously Developed Land, which is noted as the Preferred Strategy for development in the PROPOSED METHODOLOGY FOR THE ASSESSMENT OF VILLAGE DEVELOPMENT BOUNDARIES FOR THE NEWPORT LOCAL DEVELOPMENT PLAN 2011 -2026, point 1

CONCLUSION

In determining this application for inclusion of Land to the rear of 19 Oldhill Crescent into the settlement boundary of Christchurch the following summaries should be considered and borne in mind ;

- Historically, extensions of Curtilages have been included within the settlement boundary based on identical reasons of this application notably at the rear of 17 and 19 Oldhill Crescent.

- Lawful Change of Use of the Land has been established on several occasions by Local Planning Officials.

- Permitted development rights on the land has been established following visits by Local planning Officials and Councillors.

- No significant adverse impact on countryside character.

- Sustainable Location with local facilities, also meets methodology (see appendix H)

- Land is classed as Previously Developed Land as Planning Policy Wales (2011) • para 4.8.2 and Figure 4.1

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	No
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Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C1 Consistency	
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Item Question

Tick-box reply

8	8	Add a new site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3243.D2//H01	Pratt, Mr Bill	AMMRO Consulting		14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.62

Site: 291/ Rear of Old Hill Crescent

New Site

Policy: H01

Map: Inset 15: Christchurch Village Boundary

Summary: Include new site to rear of Old Hill Crescent, Christchurch

Item Question Representation Text

5 5 Inset Plan(s)

No 15 Christchurch

9 9 Amend the boundaries of an existing site.

Yes

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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This report is to accompany the application for inclusion of Domestic Curtilage at the rear of 19 to 29 Oldhill Crescent with in the settlement boundary of Christchurch.

SITE HISTORY The development of Oldhill Crescent in Christchurch was undertaken around 1955 which can be seen from the original Plot layout drawing by Thaves Architects (see appendix A). On this plan it clearly sets out the original boundaries for each plot number, where plot number 6 corresponds to No. 19 Oldhill Crescent, plot 7 is No. 21 and so on. It is worth noting that the access created for this development is between existing properties. Also in appendix A is the original title deed of 19 Oldhill Crescent dated

16/11/93 with the property register dated 20/03/1996 which shows a Charge in place where the vendors of all perimeter properties notably 17 & 19 Oldhill Crescent bounded with the land to the West are to Keep and Maintain the hedgerow along this boundary. Inset Map in Appendix B of the settlement boundary of the Village of Christchurch produced for the council's development plan. Plan A (inset map 10) is from the Borough of Newport Local Plan 1991-2006, this shows the inclusion of extended domestic Curtilage's to properties 17 to 21, although this plan was never put on deposit by the Council. Plan B (inset map 15) is of the current and soon to be updated Local Plan, This also shows the inclusion of domestic Curtilage's to properties 17 & 19.

In Appendix C, are historical aerial photographs which show the cultivated area of land now designated as domestic curtilage.

CURTILAGE EVIDENCE

As this report sets out to substantiate the inclusion of Residential Curtilage into the settlement Boundary, firstly we must justify the Domestic use of the Land. The Owner, Mr Pratt, has been cultivating the land shown on the plan in Appendix D, for the past 25 years. On 24th March 2000, Newport Borough Council senior Enforcement Officer, Paula Clarke, wrote to Mr Pratt following a visit to site with Local Councillor (see appendix E). This letter confirmed the resolution passed by planning Committee that the Change of Use of Land from Agricultural to Domestic Curtilage had taken place (however this land was never designated as agricultural, see title in appendix G). There was an inclusion of extended curtilage within the settlement boundary as shown on Inset map 15 for property numbers 17 & 19, although this did not include all of what was considered Domestic use, and reasons for this have never been issued. Subsequent site visits were undertaken in 2009 by Enforcement Officer Sophie Beny and Councillor Charles Ferris, and a letter (Appendix E) confirming their findings that the Land to the Rear and East (this should have read 'to the rear and North') was exempt from enforcement as change of use to domestic curtilage had taken place more than 10 years ago. On the ground within this curtilage, Mr Pratt also has an allotment and some outbuildings which serves the dwelling house and is attached and forming one continuous enclosure. It was suggested by the council that Curtilage to No. 17 was included as it has a defensible boundary i.e. hedges. This is not considered a valid argument as fencing and/or planting can be installed at any time and also removed at any time, the owner of no. 19 owns both parcels of Land and has no need to add any defensible boundaries between the two. It could therefore be suggested that both parcels are domestic curtilage and the cultivated area only represents a mowing regime as there are defensible boundaries around the two parcels combined.

CURTILAGE DEFINITION

The lawful use of a property (whatever it is) extends to the whole of the planning unit (i.e. the unit of occupation, unless or until any part of it can be identified as being physically and functionally separate from the whole). With this one exception, the planning unit in the case of a single private dwelling house is undoubtedly the whole of the land occupied with the house, and the lawful use of the whole of that planning unit falls within Use Class C3 in the Use Classes Order (namely use as a single private dwelling house).

Confusion can often be in relation to the concept of the domestic 'curtilage'. The first point which it is important is that the 'curtilage' (or the 'residential curtilage') of a property does not represent a use of land for planning purposes. You cannot change the use of land to use 'as residential curtilage'. If land not

19 Oldhill Crescent

forming part of the original planning unit is incorporated within that planning unit (for example, a house and the land enjoyed with it for domestic purposes). In other words if its use is changed from (say) agricultural use to domestic use, then that represents a material change of use of that land, but it makes no difference whether the area of land in question was incorporated in what can be described as the 'residential curtilage' of the house; what matters is whether it has been incorporated in the planning unit so as to change its use to domestic use. This has taken place as Permitted development rights exist by way of Allotments and outbuildings on site as shown on appendix F.

The second point to bear in mind (as you may appreciate from what I have already written above) is that the 'domestic curtilage' of a house is not necessarily co-extensive with the planning unit. This particularly applies to large houses in the countryside where the 'curtilage' may extend only to the cultivated garden, plus the forecourt immediately in front of the house, etc. However, other land within the planning unit which is not so directly related to the house may in fact fall outside the domestic curtilage. As I have pointed out above, this makes no difference in terms of the lawful use of the land. The only significance of the definition of the curtilage for planning purposes is that certain permitted development rights for operational development (outbuildings, extensions and certain other structures) apply within the curtilage of a single private dwelling house, but not to any land within the same planning unit which falls outside the curtilage.

Officials sometimes seem to get hung up with the definition of the 'curtilage' when considering questions of lawful use (as distinct from permitted development rights, which are an entirely separate issue), but I really must stress that this is of no relevance in relation to the lawful use of any part of the property. In the vast majority of cases, the whole of a domestic property will constitute a single planning unit, so that the lawful use of the whole of the property will be use as a single private dwelling house within Use Class C3 of the Use Classes Order, and this necessarily includes the whole of the land enjoyed with it for domestic purposes, whether it falls inside or outside the slightly narrower definition of 'residential curtilage'.

A small court, yard, garth, or piece of ground attached to a dwelling house, and forming one enclosure with it, or so regulated by the law; the area attached to and containing a dwelling house and its outbuildings. Domestic Curtilage is usually a garden, but: can include parking areas, access roads, vegetable plots, children's play equipment, and stables (where the horses are kept for pleasure rather than agricultural use). The domestic curtilage is not necessarily marked off or enclosed, but it should be clearly attached to the house or serving the purpose of the house in some useful and intimate way. This

Representation Details

Newport City Council Local Development Plan

by: Representation No

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fact alone can cause the most confusion especially in rural areas where the site owner red edges a site of large proportions for a Planning application or an application for a Certificate of Lawful Development. IMPACT ON LANDSCAPE.

Given the location of the application site and the surrounding existing development and planting it is considered that there would be no adverse effect on the visual amenity and functioning of the surrounding countryside. The site is not visible from Oldhill Crescent or from the adjacent recreation ground due to the site being completely enclosed by mature trees and dense hedgerows. In this regard the only location from where the site is visible is from Trinity View, Caerleon, some 1.6 miles away. This view is also obscured by the trees and hedges, therefore inclusion of the site into the settlement boundary will not be harmful to the countryside.

SUSTAINABILITY

The site is in a sustainable location, ie walking distance to local services, such as Tesco Express (7 mins), Local Pub (2 mins), Church (1 min), Post Box (2 mins), Post Office (7 mins) and bus stop (4 mins). The bus stop includes routes direct to Spytty Retail Park and Newport City Centre. This is highlighted in the PROPOSED METHODOLOGY FOR THE ASSESSMENT OF VILLAGE DEVELOPMENT BOUNDARIES FOR THE NEWPORT LOCAL DEVELOPMENT PLAN 2011 -2026, point 3 and 4.

19 Oldhill Crescent

Planning Policy Wales (2011) -see para 4.8.2 and Figure 4.1 means that all garden land is Previously Developed Land, which is noted as the Preferred Strategy for development in the PROPOSED METHODOLOGY FOR THE ASSESSMENT OF VILLAGE DEVELOPMENT BOUNDARIES FOR THE NEWPORT LOCAL DEVELOPMENT PLAN 2011 -2026, point 1

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- No significant adverse impact on countryside character.
- Sustainable Location with local facilities, also meets methodology (see appendix H)
- Land is classed as Previously Developed Land as Planning Policy Wales (2011) • para 4.8.2 and Figure 4.1

Additional Information Submitted - Available on Request

15	15	Do you want to speak at Public Examination?	No
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Item Question Soundness Test

1	1	I think the LDP is sound.	No
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13	13	Test of Soundness C1 consistency	
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Item Question

Tick-box reply

8	8	Add a new site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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3244.D1//H15.01 C	Dennis, Ms Janette			14/06/2012	<input type="checkbox"/>	E	O		M	
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Document: Deposit Plan, p.71

Site: 428/ Pound Hill

[Delete Site](#)

Policy: H15.01 Coedkernew

Summary: Delete Gypsy and Traveller site from LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

I object to the proposed use of Allocations H15, H16 and H17 (Newport LDP) for gypsy/traveller sites for the following reasons :-

A Health and well being of gypsy/ travellers living on the site may be affected by:-

1.Close proximity of pylons and power lines

2. Traffic noise and pollution- road safety for children.

The road is busy, much of the traffic using it is heavy - articulated lorries, tractors, oil tankers etc. It appears to go between two of the sites thus increasing the risk of accident caused by/ to straying animals or individuals (esp children)

3 . There is neither mains drainage nor gas available in the area.

4. Two of the sites are in or very near the projected expansion route for the M4 - if this is developed the families would - again- be forced to move.

5. As detailed in the open meeting in the village hall the current site (without planning permission) on Queensway meadows has attracted others who have threatened the travellers in that enclosure and caused a fracas in the road.

B Equality and fairness

6. The proposed sites are outside the settlement lines - as I understand it development by private individuals is not allowed/ severely restricted. Granting of special permission to allow development for such a site is not fair to local residents, particularly those who have applied for permission to develop and been refused - and will not be conducive to development of good relationship between communities.

7. There are additional caravans and livestock (governed by movement orders etc I hope, as this would only be fair!) at the side of the road by the site (without planning permission) on Queensway Meadows, these are owned by people who weren't allowed into the managed site. Some of the wooden posts originally erected by the city council to stop these illegal sites have had to be uprooted to get the caravans in. There is a concern that the proposed sites would give rise to other illegal roadside sites (trespass on farming land and other associated vandalism and flytipping). I stress this is not a racist view, but one based on observation and factual evidence. This is an outcome of the managed site, tolerated by Newport City Council as a investigation and social experiment- this outcome would not be fair to local residents or the Travellers sites in H17 etc equally (see point 5).

C Local history/ natural history/ bird sanctuary/ wildlife

8. The effect of these developments would be quite disastrous for local wildlife (remembering that the area is an area of SSI and the home of badgers, otters, water voles and greater crested newts - all protected species.)

9.Although the temporary travellers' site on Queensway Meadows appears quite well managed and tidy (and do not have planning permission) it has attracted two different satellite sites resulting in unsightly destruction and damage. See point 7.

10. Changes to the road system to accomodate the sites- paving, sleeping policemen, lighting and other associated street furniture and restrictions which are not in keeping with the rural aesthetic. All these changes are in the welsh assembly gov pack for Traveller site requirments and would cause severe change if implemented.

D Danger of flooding

11. Living on a flood plain we have become increasingly aware of the danger of flooding and recently have had telephone warnings about potential flooding. It seems unfair to potential occupiers to deliberately choose to put a site for single storey dwellings in such a place.

Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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I understand that there is a set of recommendations/guidelines prepared by the Welsh Assembly regarding the sites for gypsy/travellers. I also understand that the Allocations cited in my introductory sentence do not meet these recommendations/guidelines.

I urge you - in the interest of openness and fairness to all, to review the evidence and find the best place for the gypsy/ traveller sites .

15	15	Do you want to speak at Public Examination?								Neither
		Not Ticked								

Item Question *Soundness Test*

1	1	I think the LDP is sound.								Neither
		Not Ticked								

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3244.D2//H15.02	Dennis, Ms Janette			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Delete Gypsy and Traveller site in LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

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Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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15	15	Do you want to speak at Public Examination?								Neither
		Not Ticked								

Item Question *Soundness Test*

1	1	I think the LDP is sound.								Neither
		Not Ticked								

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3244.D3//H16.01	Dennis, Ms Janette			14/06/2012	<input type="checkbox"/>	E	C		M	

Document: Deposit Plan, p.72

Site: 407/ Yew Tree Cottage

[Delete Site](#)

Policy: H16.01

Summary: Objects to Gypsy and Traveller site allocated in LDP

Item Question *Representation Text*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

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Representation Details

Newport City Council Local Development Plan

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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15	15	Do you want to speak at Public Examination?								Neither
		Not Ticked								

Item Question *Soundness Test*

1	1	I think the LDP is sound.								Neither
		Not Ticked								

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3244.D4//H16.02	Dennis, Ms Janette			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Delete Gypsy and Traveller site from LDP

Item Question *Representation Text*

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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14 14 Representation

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6. The proposed sites are outside the settlement lines - as I understand it development by private individuals is not allowed/ severely restricted. Granting of special permission to allow development for such a site is not fair to local residents, particularly those who have applied for permission to develop and been refused - and will not be conducive to development of good relationship between communities.

7. There are additional caravans and livestock (governed by movement orders etc I hope, as this would only be fair!) at the side of the road by the site (without planning permission) on Queensway Meadows, these are owned by people who weren't allowed into the managed site. Some of the wooden posts originally erected by the city council to stop these illegal sites have had to be uprooted to get the caravans in. There is a concern that the proposed sites would give rise to other illegal roadside sites (trespass on farming land and other associated vandalism and flytipping). I stress this is not a racist view, but one based on observation and factual evidence. This is an outcome of the managed site, tolerated by Newport City Council as a investigation and social experiment- this outcome would not be fair to local residents or the Travellers sites in H17 etc equally (see point 5).

C Local history/ natural history/ bird sanctuary/ wildlife

8. The effect of these developments would be quite disastrous for local wildlife (remembering that the area is an area of SSI and the home of badgers, otters, water voles and greater crested newts - all protected species.)

9.Although the temporary travellers' site on Queensway Meadows appears quite well managed and tidy (and do not have planning permission) it has attracted two different satellite sites resulting in unsightly destruction and damage. See point 7.

10. Changes to the road system to accomodate the sites- paving, sleeping policemen, lighting and other associated street furniture and restrictions which are not in keeping with the rural aesthetic. All these changes are in the welsh assembly gov pack for Traveller site requirments and would cause severe change if implemented.

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11. Living on a flood plain we have become increasingly aware of the danger of flooding and recently have had telephone warnings about potential flooding. It seems unfair to potential occupiers to deliberately choose to put a site for single storey dwellings in such a place.

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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I understand that there is a set of recommendations/guidelines prepared by the Welsh Assembly regarding the sites for gypsy/travellers. I also understand that the Allocations cited in my introductory sentence do not meet these recommendations/guidelines.

I urge you - in the interest of openness and fairness to all, to review the evidence and find the best place for the gypsy/ traveller sites .

15	15	Do you want to speak at Public Examination?								Neither
		Not Ticked								

Item Question *Soundness Test*

1	1	I think the LDP is sound.								Neither
		Not Ticked								

Representation Details

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3244.D5//H16.03	Dennis, Ms Janette			14/06/2012	<input type="checkbox"/>	E	O		M	

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

[Delete Site](#)

Policy: H16.03

Summary: Objects to Gypsy and Traveller site in LDP

Item Question *Representation Text*

Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14 14 Representation

I object to the proposed use of Allocations H15, H16 and H17 (Newport LDP) for gypsy/traveller sites for the following reasons :-

A Health and well being of gypsy/ travellers living on the site may be affected by:-

1.Close proximity of pylons and power lines

2. Traffic noise and pollution- road safety for children.

The road is busy, much of the traffic using it is heavy - articulated lorries, tractors, oil tankers etc. It appears to go between two of the sites thus increasing the risk of accident caused by/ to straying animals or individuals (esp children)

3 . There is neither mains drainage nor gas available in the area.

4. Two of the sites are in or very near the projected expansion route for the M4 - if this is developed the families would - again- be forced to move.

5. As detailed in the open meeting in the village hall the current site (without planning permission) on Queensway meadows has attracted others who have threatened the travellers in that enclosure and caused a fracas in the road.

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6. The proposed sites are outside the settlement lines - as I understand it development by private individuals is not allowed/ severely restricted. Granting of special permission to allow development for such a site is not fair to local residents, particularly those who have applied for permission to develop and been refused - and will not be conducive to development of good relationship between communities.

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Representation Details

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Newport City Council Local Development Plan

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3244.D6//H17	Dennis, Ms Janette			14/06/2012	<input type="checkbox"/>	E			M	

Document: Deposit Plan, p.72

Policy: H17

Summary: Objects to Gypsy and Traveller sites allocated in the LDP

Item Question *Representation Text*

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
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Item Question *Soundness Test*

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Representation Details

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3245.D1//H15.02	Ducroq, Ms Coral			29/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.71

Site: 414/ Queensway Meadows

Delete Site

Policy: H15.02

Summary: Objection to inclusion of site in deposit plan - Queensway Meadows.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>	
2	2	Policy Number H15 ii	
4	4	The Proposals Map	Yes
11	11	Site Name Queensway Meadow	

Representation Details

Newport City Council Local Development Plan

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14	14	Representation								
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Please find below my objections to the Draft Newport Local Development Plan.

From reading the Draft Newport LDP, I would like to object to several policies and proposed allocated sites, as the LDP is felt to be unsound. The reason for my objections are set out below, but I would also like to highlight that I feel the LDP is contrary to five of the LDP 'Test of Soundness', as follows:

- LDP does not have regard to relevant plans, policies and strategies relating to the area or adjoining areas – Test of Soundness C1
- LDP does not have regard to national policy – Test of Soundness C2
- LDP does not have regard to the Wales Spatial Plan – Test of Soundness C3
- LDP does not have a coherent strategy from which policies and allocations logically flow - Test of Soundness CE 1
- LDP strategy, policies and allocations are not realistic or appropriate and they are not founded on a robust and credible evidence base.

The principle reasons for feeling the Newport LDP is unsound relate to the inappropriate allocation of Gypsy and Traveller Sites, primarily those in Nash (2 sites on Broadstreet Common, and one site at Queensway Meadows), and therefore I am objecting to LDP policies:

- H15 - Gypsy & Traveller Transit Accommodation (H15 (ii) – Queensway Meadows)
- H16 - Gypsy & Traveller Residential Accommodation (H16 (ii) Former army barracks & (iii) Former army camp site, both at Pye Corner, Nash).
- H17 – Gypsy & Traveller Accommodation Proposals.

As stated above the inappropriate allocation of the gypsy & traveller sites within the LDP is not only contrary to National policy, technical advice notes, circulars, but also policies within your very own draft LDP, therefore there is no logical strategy to the allocation of sites, making the Newport LDP unsound. The sites are also contrary to advice provided within Welsh Government guidance provided to aid Councils in choosing such sites, but also contrary to WG guidance provided to Councils when seeking funding for the development of these sites.

The area of Nash and the Gwent Levels has been recognised at national level for its special qualities for biodiversity, ecology, archaeology, history and for this reason the Gwent Levels and the area of Nash has be subject to restricted planning regulations, many of these features have been identified on the Draft LDP proposals and constraints maps, but have not been considered when allocating the sites on Broadstreet Common, Nash. Draft LDP Allocations H16 ii and iii are subject to the following planning restrictions:

- Outside the settlement limits
- Site of Special Scientific Interest (SSSI) - The site on Broadstreet Common (opposite Llwyn Derw) is within a SSSI, the other 2 sites are immediately adjacent to a SSSI. The Nash & Goldcliff SSSI – contains nationally rare and/or notable species of European protection status. SSSI's are a 'Statutory Nature Conservation Designation' of NATIONAL IMPORTANCE (Wildlife and Countryside Act, as amended by the Countryside & Rights of Way Act 2000). In the area of the two Nash sites the SSSI is designated due to the botanical and invertebrate interest of the reens.
- Identified as a Coastal & Floodplain Grazing Marsh (a Section 42 habitat under the Natural Environment & Rural Communities Act 2006). The area is identified as a habitat of Principle Importance for Conservation of Biological Diversity in Wales. The Coastal and Floodplain grazing marsh is defined as a Priority Habitat type in the UK Biodiversity Action Plan (UK BAP).
- The two sites in Nash are immediately adjacent to the Severn Estuary Special Protection Area (SPA), Special Area for Conservation (SAC) and Ramsar site.
- Landscape of Outstanding Historic Interest
- Floodzone C1
- Environment Agency (EA) Data identifies the whole area of Nash as at risk of flooding from rivers or seas and the area is subject to flood warning systems. EA data also shows that the area is at risk from flooding from rivers or sea without defences and the sites would be highly likely to be flooded during an extreme flood, including all access roads to the sites.
- Archaeologically Sensitive Area
- Special Landscape Area
- Undeveloped Coastal Zone
- 1 site within the M4 Protected corridor, the other immediately adjacent to it.
- No mains sewage in this part of Nash
- No mains drainage in this part of Nash
- No mains gas, most people use oil or coal
- Area classified as Coastal & Floodplain Grazing Marsh (a section 42 habitat under the Natural Environment & Rural Communities Act 2006). A habitat of Principle Importance for Conservation of Biological Diversity in Wales.
- Badges, Otter, Bats, Great Crested Newts, Water voles – all present and recorded in the area, and are protected by the Wildlife and Countryside Act (1981), and are UK BAP species.
- LANDMAP ASSESSMENT – CCW's Landmap assessment has analysed the sites in question and has produced the following assessment of the landscape quality, reference to the importance of LANDMAP is provided by PPW, Edition 4, Para 5.3.13. Landscape rating: OUTSTANDING – 'Gwent levels are one of the most extensive areas of reclaimed wet pasture in the UK. They are rich in plant species and communities due to the variety of ree types and their management. A number of nationally rare plant species and invertebrates are recorded from this section of the Levels.' Visual & Sensory rating: HIGH – 'The Levels are rare, distinctive landscape of rectangular and sinuous fieldscapes with reens, hedges, and field boundary trees and attractive settlements and farmhouse with a strong sense of place. It would be of outstanding value if there were not some degrading of the landscape and detractors in places.'

Cultural Landscape rating: OUTSTANDING – 'Outstanding as an unique feature to Britain, a multi period evolved historic reclaimed landscape of exceptional integrity dating back at least to the Roman

Representation Details

Newport City Council Local Development Plan

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surroundings.

- GP3 - GENERAL DEVELOPMENT PRINCIPLES: SERVICE INFRASTRUCTURE – Only small parts of Nash are on mains gas supply - NOT in the area of these sites, NO MAINS SEWAGE in Nash. (All a cost to the Council if sites located here)

- GP4 - GENERAL DEVELOPMENT PRINCIPLES: HIGHWAYS & ACCESSIBILITY – Guidance for the design and setting of gypsy traveller sites required appropriate access for pedestrians, cyclists and public transport in accordance with national guidance. The area of Broadstreet Common where two sites are proposed have no pavements, and there is an issue with speeding drivers. Should pavements and pedestrian crossings be constructed, as required by the Good Practice Guide in Designing Gypsy/Traveller Sites in Wales, then these features are not features of a rural location and there is little room to put these in place and maintain an appropriate road width (as required by the good practice guidance) as the roads are constrained on both sides by reens.

- GP5 - GENERAL DEVELOPMENT PRINCIPLES: NATURAL ENVIRONMENT – This Policy is supposed to protect and encourage biodiversity and ecology connectivity and states there should be 'no unacceptable impact on landscape quality'. Draft LDP Paragraph 3.23, states in reference to SSSI (of which these sites are), 'these sites require the fullest regard to the intrinsic value of the site and their nature conservation value. Development with the potential to affect a recognised site will be closely scrutinised for any direct or indirect effects. The developer must demonstrate the case for development and why it could not be located on a site of less significance for nature conservation.' Please can the Council show this consideration process? The process for choosing sites does not seem to have been logical or consistent, some sites were dismissed in the first round of consideration due to being a SSSI or because they are in a flood plain, so why do two sites that are both in the flood zone and are SSSI status, amongst possessing others factors on which sites were dismissed, have ended up being draft LDP allocations.

- GP6 - GENERAL DEVELOPMENT PRINCIPLES: QUALITY OF DESIGN – It is difficult at present to assess the design concept of the sites as they have yet to reach application stage, but when considering the 'Good Practice Guide in Designing Gypsy Traveller Sites in Wales' and the necessary requirements for the sites, such as traffic calming measures not just within the site, but on the near by roads, lighting of the site and approaches to it and a minimum width of road to accommodate large towing caravans in both directions; these design factors are not possible in this location without causing major disruption and resulting in an rural area possessing urban characteristics, which would be contrary to this policy, and others in the plan.

- GP7 - GENERAL DEVELOPMENT PRINCIPLES: ENVIRONMENTAL PROTECTION & PUBLIC HEALTH – development should not 'cause harm to health because of land contamination, dust, noise, light pollution, flooding, water pollution or any other identified risk to the environment, local amenity or public health and safety', as stated by the Draft LDP Policy GP7. It is likely that such a future development has potential to harm either the sites residents or neighbouring residents through light pollution, water pollution, potential to effect flooding and the local drainage system of reens, and the environmental factors such biodiversity and ecology of protected species.

- GP8 – GENERAL DEVELOPMENT PRINCIPLES: ARCHAEOLOGY – The area is an 'Archaeological Sensitive Area' as identified by the LDP itself. Consideration needs to be given to this.

- CE3 – ROUTEWAYS, CORRIDORS & GATEWAYS – this policy states that the routes of future road ways need to be protected so not to preclude future road expansion. One site is within the 'protected zone' and the other immediately next to the M4 expansion route. Therefore, there is potential that the gypsy/travellers would need to be moved in the future if the M4 were to be expanded – this would be more disruption and cost to the Council. Aside from this, guidance suggests that gypsy travellers should not be housed in areas of high noise or pollution – a site that could in the future be next to a motorway is likely to be both noisy and polluted from fumes.

- CE10 – ARCHAEOLOGICALLY SENSITIVE AREAS – Developments in this area require an archaeological impact assessment to be conducted. In locations such as Nash where there is potential for features to be below ground level, such surveys should be conducted early in the process so to ascertain both potential cost of mitigation and associated time delays. At present these surveys do not appear to have been conducted, which is common place, but in Such a situation with LDP allocation, all sites allocated should be 'deliverable'.

- CE11 – CONSERVATION AREAS – None of the sites are within a Conservation Area, but the policy and supporting text of Draft LDP Para 4.37 references, 'The Gwent Levels which has been specifically recognised by the Wales Spatial Plan, are recognised in the LDP and proposed developments will be required to avoid the loss of such a finite resource'. How does the Sustainability Appraisal and Habitat Regulations Assessment of the Local Development Plan assess the proposed gypsy/traveller sites considering the many environmental factors associated with the sites and the acknowledgement at National level that the Gwent Levels are worthy of special protection/ consideration?

- CE12 – LOCALLY DESIGNATED NATURE CONSERVATION & GEOLOGICAL SITES – The Gwent Levels are referenced within the Local Biodiversity Action Plan (LBAP) and identified as containing certain priority habitats and species, so according to Draft LDP Policy CE12, planning applications affecting these sites should be given serious consideration to ensure that these areas are not put at risk, either directly or indirectly.

- CE13: COASTAL ZONES – This Policy states 'Development will not be permitted in the coastal area or adjoining the tidal river' unless development is required to meet an exceptional need which cannot be accommodated elsewhere, requires a coastal location, and that the development is not sensitive to flooding. Both Broadstreet Common sites are within the coastal zone and in flood zone C1; additionally, these sites do not need to be in the coastal zone and alternative sites exist within the Borough and need to be explored further.

- H15: GYPSY & TRAVELLER TRANSIT ACCOMMODATION – objection to inclusion of the Queensway Meadows Site (H15 ii) in this policy as the site is inappropriate in this location, for reason set out in this document.

- H16: GYPSY & TRAVELLER RESIDENTIAL ACCOMMODATION - object to inclusion of the TWO sites at Pye Corner, Nash (H16 ii & iii) in this policy as the sites are inappropriate in this location, for reasons set out in this document.

- H17: GYPSY & TRAVELLER ACCOMMODATION PROPOSALS – Support this policy; but the three sites in Nash DO NOT COMPLY with this policy or the supporting text as the size of the population of just one site would have an overbearing impact on the village, if both sites come to fruition then this would have such an impact on the area of Nash, Goldcliff and Whitson, it is doubtful whether the village infrastructure, or lack of, could cope with this level of increase in population. The sites are not capable of being served by utilities or waste disposal and these are not capable of being provided in

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this area. It is questionable whether the sites are capable of being served by the emergency services at times of flood. The sites are within Flood Zone C1 and therefore in a high risk flood area, with caravans being particularly vulnerable. The sites also do not comply with various other draft LDP policies, as identified above, including the presence of European species protected by the Wildlife and Countryside Act (1981) (as amended) and by the EC Habitats Directive, such as otters, bats, badgers and various bird species. The choice of sites for the gypsy travellers within the LDP does indicate a logical or understandable process for choosing the sites was undertaken, it is doubtful whether a proper search criteria was applied consistently across the local authority area. PPW, Edition 4, Para. 9.2.9 sets out criteria for the allocation of housing sites, many points of which include the need to be close to services and safe walking distances from primary schools and shops – this is not possible at H16 ii & iii, as there are no pavements or street lighting and the roads are bordered by deep drainage ditches filled with water, these present a drowning hazard to children and adults. The sites are located within a flood zone, there is no mains drainage or sewerage, and no mains gas supply; as well as the sites being SSSI designated for their rich ecological resources and protected species, some of which are protected under European legislation.

Good Practice Guidance in Designing Gypsy Traveller Sites in Wales – Reference is made to Chapter 3 – Site Design and Location, with specific reference to Paragraphs 3.2.5, 3.3.3, 3.4 and 3.5 as the allocated gypsy traveller sites in Broadstreet Common, Nash do not comply with the requirements for a gypsy traveller site. For this reason the H15 ii and H16 ii & iii should be removed from the Draft LDP, and new sites should be found taking into account the requirements listed in the good practice guidance document. Many of the recommendations contained within the good practice guidance are also contained within the 'Gypsy Traveller New Sites Grant 2011 – 2012

Guidance Note for Councils applying for a grant for such sites. From this guidance it suggests that sites not complying with the recommendations, are unlikely to be given funding. The identified sites in the LDP do not comply and therefore should not be taken forward as part of the LDP process. As the gypsy & traveller sites are contrary to the policies and guidance from European level through to a local level then they should not be allocated and be removed from the draft LDP. Ultimately the inclusion of these allocations within the LDP make the plan unsound, and should these sites be submitted as a planning application, 'theoretically' would not be approved as they are contrary to LDP policy! So it is questioned how have these sites reached this stage of the plan process as they should not have scored positively in your Strategic Environmental Assessment and Sustainability Appraisal?! I have grave concerns that the allocation and subsequent development of these sites would negatively affect the Gwent Levels and SSSI qualifying features and the ability of the Gwent Levels to be managed for biodiversity in the future.

Sites H15 ii and H16 ii & iii are also contradictory to the guidance provided by yourselves in SPG, namely SPG – Wildlife and Development and SPG – Flood Risk and Sustainable Drainage Systems. It is understood that many of the issues highlighted in this objection letter are not total barriers to development and can possibly be overcome at a high cost and after much investigation and time, but there are such a multitude of issues affecting these sites that the cost to the tax payer and the Council, both monetary cost and time in an attempt to justify permitting a planning application the future could prove unobtainable. As there is such doubt over the deliver-ability of these sites, then it makes the Newport LDP unsound, as a Council can not put forward a plan for inspection and subsequent adoption when the deliver-ability of sites is in question. This doubt over the deliverability of the sites was in fact mentioned by Council officers at the LDP community consultation meeting that took place in Nash Village Hall in May. If Council officers, in fact the Head of Planning, are themselves openly stating that some of the gypsy traveller sites may not be deliverable, then the LDP allocation of gypsy traveller sites needs to be re-visited and the LDP process suspended until the issue has been resolved. I wish to be kept informed of the LDP process and would request to speak at the LDP Inquiry. I would also be grateful if you could acknowledge in writing the receipt of this representation.

Yours sincerely

Coral Ducroq

15	15	Do you want to speak at Public Examination?	Neither
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Item Question *Soundness Test*

1	1	I think the LDP is sound.	Neither
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Item Question

Tick-box reply

10	10	Delete an existing site.	Yes
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Representation Details

by: Representation No

Filtered to show: (all of) Stage=D

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3245.D2//H16.02	Ducroq, Ms Coral			29/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 415/ Former Army Barracks

Delete Site

Policy: H16.02

Summary: Objection to inclusion of site in deposit plan - Former Army Barracks, Pye Corner, Nash.

Item Question Representation Text

2 2 Policy Number

h16 ii

11 11 Site Name

former army barracks

Representation Details

Newport City Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=D

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
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14	14	Representation								
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Please find below my objections to the Draft Newport Local Development Plan.

From reading the Draft Newport LDP, I would like to object to several policies and proposed allocated sites, as the LDP is felt to be unsound. The reason for my objections are set out below, but I would also like to highlight that I feel the LDP is contrary to five of the LDP 'Test of Soundness', as follows:

- LDP does not have regard to relevant plans, policies and strategies relating to the area or adjoining areas – Test of Soundness C1
- LDP does not have regard to national policy – Test of Soundness C2
- LDP does not have regard to the Wales Spatial Plan – Test of Soundness C3
- LDP does not have a coherent strategy from which policies and allocations logically flow - Test of Soundness CE 1
- LDP strategy, policies and allocations are not realistic or appropriate and they are not founded on a robust and credible evidence base. The principle reasons for feeling the Newport LDP is unsound relate to the inappropriate allocation of Gypsy and Traveller Sites, primarily those in Nash (2 sites on Broadstreet Common, and one site at Queensway Meadows), and therefore I am objecting to LDP policies:
 - H15 - Gypsy & Traveller Transit Accommodation (H15 (ii) – Queensway Meadows)
 - H16 - Gypsy & Traveller Residential Accommodation (H16 (ii) Former army barracks & (iii) Former army camp site, both at Pye Corner, Nash).
 - H17 – Gypsy & Traveller Accommodation Proposals.

As stated above the inappropriate allocation of the gypsy & traveller sites within the LDP is not only contrary to National policy, technical advice notes, circulars, but also policies within your very own draft LDP, therefore there is no logical strategy to the allocation of sites, making the Newport LDP unsound. The sites are also contrary to advice provided within Welsh Government guidance provided to aid Councils in choosing such sites, but also contrary to WG guidance provided to Councils when seeking funding for the development of these sites. The area of Nash and the Gwent Levels has been recognised at national level for its special qualities for biodiversity, ecology, archaeology, history and for this reason the Gwent Levels and the area of Nash has been subject to restricted planning regulations, many of these features have been identified on the Draft LDP proposals and constraints maps, but have not been considered when allocating the sites on Broadstreet Common, Nash. Draft LDP Allocations H16 ii and iii are subject to the following planning restrictions:

- Outside the settlement limits
- Site of Special Scientific Interest (SSSI) - The site on Broadstreet Common (opposite Llwyn Derw) is within a SSSI, the other 2 sites are immediately adjacent to a SSSI. The Nash & Goldcliff SSSI – contains nationally rare and/or notable species of European protection status. SSSI's are a 'Statutory Nature Conservation Designation' of NATIONAL IMPORTANCE (Wildlife and Countryside Act, as amended by the Countryside & Rights of Way Act 2000). In the area of the two Nash sites the SSSI is designated due to the botanical and invertebrate interest of the reens.
- Identified as a Coastal & Floodplain Grazing Marsh (a Section 42 habitat under the Natural Environment & Rural Communities Act 2006). The area is identified as a habitat of Principle Importance for Conservation of Biological Diversity in Wales. The Coastal and Floodplain grazing marsh is defined as a Priority Habitat type in the UK Biodiversity Action Plan (UK BAP).
- The two sites in Nash are immediately adjacent to the Severn Estuary Special Protection Area (SPA), Special Area for Conservation (SAC) and Ramsar site.
- Landscape of Outstanding Historic Interest
- Floodzone C1
- Environment Agency (EA) Data identifies the whole area of Nash as at risk of flooding from rivers or seas and the area is subject to flood warning systems. EA data also shows that the area is at risk from flooding from rivers or sea without defences and the sites would be highly likely to be flooded during an extreme flood, including all access roads to the sites.
- Archaeologically Sensitive Area
- Special Landscape Area
- Undeveloped Coastal Zone
- 1 site within the M4 Protected corridor, the other immediately adjacent to it.
- No mains sewage in this part of Nash
- No mains drainage in this part of Nash
- No mains gas, most people use oil or coal
- Area classified as Coastal & Floodplain Grazing Marsh (a section 42 habitat under the Natural Environment & Rural Communities Act 2006). A habitat of Principle Importance for Conservation of Biological Diversity in Wales.
- Badges, Otter, Bats, Great Crested Newts, Water voles – all present and recorded in the area, and are protected by the Wildlife and Countryside Act (1981), and are UK BAP species.
- LANDMAP ASSESSMENT – CCW's Landmap assessment has analysed the sites in question and has produced the following assessment of the landscape quality, reference to the importance of LANDMAP is provided by PPW, Edition 4, Para 5.3.13. Landscape rating: OUTSTANDING – 'Gwent levels are one of the most extensive areas of reclaimed wet pasture in the UK.

They are rich in plant species and communities due to the variety of reed types and their management. A number of nationally rare plant species and invertebrates are recorded from this section of the Levels.'

Visual & Sensory rating: HIGH – 'The Levels are rare, distinctive landscape of rectangular and sinuous fieldscapes

with reens, hedges, and field boundary trees and attractive settlements and farmhouse with a strong sense of place. It would be of outstanding value if there were not some degrading of the landscape

by: Representation No

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and detractors in places.'

Cultural Landscape rating: OUTSTANDING – 'Outstanding as an unique feature to Britain, a multi period evolved historic reclaimed landscape of exceptional integrity dating back at least to the Roman era' Historic Landscape rating: OUTSTANDING - ' a complex diverse irregular landscape, largely the product of mosaic land reclamation carried out during the medieval period, characterised by a well-preserved network of small irregular fields, dispersed settlement and large commons. Recent archaeological work has demonstrated an exceptional abundance of intertidal archaeology in this area dating back to early prehistoric period'.

Due to sensitive location of these sites, and above listed features, each of which carries its own restrictions, sites H15(ii), H16(ii & iii) and policy H17 are contrary to the following draft LDP policies:

- SP1 – SUSTAINABILITY - sites are in the countryside, not sustainable due to rural location with limited bus services, distance from health facilities. It is acknowledged that the Council are using the 'rural exception' policy to the allocation of the gypsy/traveller sites – reluctantly accepting this, sites should still be sustainable, these sites are not; further details given below.
- SP3 – FLOOD RISK – located within Floodzone C1. According to TAN 15 (Development & Flood Risk) new development should be directed away from those areas which are at high risk of flooding (TAN15, Para 3.1) and caravans are classified as 'highly vulnerable development' and at high risk during times of flood (TAN15, Para. TAN 15, Figure2). TAN 15, Para 11.2, states that the 'instability of caravans places their occupants, and others, at special risk and it may be difficult to operate an effective flood warning system'. Developments should be designed to cope with the threat and consequences of flooding – how do you do that here without incurring INCREDIBLE costs, and are the solutions actually practical and workable. The raising of the land above flood level does not solve problem as the access roads to the site are also below sea level, so do they propose to raise the level of ALL surrounding roads. If not then at a time of flood emergency services (police, ambulance, fire) would not reach the site, whilst the residents are 'sat on an island!' TAN15 requires local authorities to 'fully explain and justify the reasons for allocating a site within zone C.....A proposed allocation should not be made if the consequences of a flooding event cannot be effectively managed.' I have seen no evidence to show that the Council have looked in detail at the flooding issues, that the consequences would be acceptable or that emergency services could access the site at times of flood. Has a Flood Consequence Assessment been conducted? If so, this has not been made available during the public consultation period. PPW, Edition 4, Para. 13.2.1 – 13.4.4, provides a vast amount of guidance on flood risk and development, the allocated sites within the floodplain are contrary to this guidance, and advises that authorities take a precautionary approach when allocating sites – it is not clear that Newport CC have taken such a precautionary approach, nor that development of the scale proposed would not effect flooding/drainage issues on the immediate vicinity or further afield along The Levels.
- SP5 – COUNTRYSIDE – sites outside the settlement limits, therefore in the countryside. As previously mentioned, it is acknowledged that the Council have used their discretion to allocate these sites in the countryside as 'rural exception sites', but aside from this the other factors mentioned in Policy SP5 should be considered, it is clear they have not. Consideration should be given to appropriate uses in the countryside, respect and enhancement of the landscape character and biodiversity of the immediate and surrounding area and it should be appropriate in scale and design. Considering the number of 'pitches' proposed on both the permanent and transient sites (either separately or together) would be vastly out of character and scale for a rural area, and an area not even within the village boundary. The number of people that would live at these sites would almost increase the population of the village by 50%, this is an increase that a rural area with no shops, doctors, local primary school and no mains drainage, or gas supply could sustain, unless substantial investment in infrastructure is put in place. Draft LDP Policy SP5, Para. 2.26 states that 'the countryside has value for landscapes, natural resources, agriculture, ecology, geology, history, archaeology and outdoor recreation. It will rarely be appropriate location for development, except where this is for specific benefit of the rural economy.' How is the allocation of such large sites, which are not be suitable for brick and mortar residential accommodation of this scale be suitable for a large number of caravans and still protect or enhance the ecology, archaeology, history and recreational value of a rural area? The two Broadstreet Common sites are contradictory to the advice given in PPW, Edition 4, Para 4.6.8, which advises that development should only be located within the settlement limits where it can be 'best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It also states that new development should respect the local character and scale of the surroundings; the intensive development of these sites is not respecting the local scale of a rural community where residential densities are low. Therefore the allocation of sites H16 (ii & ii) is contrary to advice within PPW and therefore makes your LDP unsound.
- SP8 – SPECIAL LANDSCAPE AREA (SLA) – As part of the Caldicot Levels, the sites and the wider area of Nash are designated as an SLA, draft LDP Policy SP8 requires development in these areas to 'contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features'. At this point in time I have seen information justifying how the allocation of these sites would 'contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features', or how the sites would 'ensure that proposals do not impact or affect the intrinsic character quality, feature and conservation value of the SLA' (Draft LDP Para. 2.32).
- SP9 – CONSERVATION OF THE NATURAL, HISTORIC & BUILT ENVIRONMENT – The sites are located within SSSI, Special Landscape Areas and these designated sites have important environmental resources, and the Council has a duty under various legislation including the Natural Environmental and Rural Communities Act (2006), Conservation of Habitats and Species Regulations (2010), Countryside and Rights of Way Act (2000) and the Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations (1999) to ensure that they are protected from inappropriate or damaging development. 'The protection, retention safeguarding, conservation and enhancement of heritage assets will be sought, and where new development is proposed that affects the building or site or its setting, this should be of the highest quality' (LDP Para 2.34). Justification needs to be provided to show how the allocation of these sites complies with the above Acts and legislation – as yet this justification has not been provided.
- GP1 – GENERAL DEVELOPMENT PRINCIPLES: CLIMATE CHANGE – LDP Draft LDP Paragraph 3.4 states that 'flood risk is a key concern for Newport due to its coastal proximity and its location on the River Usk'. Whilst Para. 3.5 states that 'Development will be directed away from flood risk areas...'. Both sites on Broadstreet Common are located within Flood zone C1.
- GP2 – GENERAL DEVELOPMENT PRINCIPLES: GENERAL AMENITY – Policy GP2 states development permitted only where there will be no significant effect on local amenity, no effect on noise, disturbance, privacy, overbearing, light, odours and air quality. Para 3.11 states that 'The scale, nature and sighting of a proposal must be appropriate to the location and must not undermine the character of either the site or the locality.' (The equivalent of a new village population on the small village of Nash would significantly harm the character of a rural area, the facilities would not cope,

Representation Details

Newport City Council Local Development Plan

by: Representation No

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lighting that is required for access into and on these traveller sites would be uncharacteristic to a rural area that does not have street lighting, also this would have significant effect on the wildlife in the area such as fish, invertebrates, otter, badger & bat that are all present on the sites and in the reens surrounding the sites, thus all resulting in a massive cumulative overbearing impact on the surroundings.

- GP3 - GENERAL DEVELOPMENT PRINCIPLES: SERVICE INFRASTRUCTURE – Only small parts of Nash are on mains gas supply - NOT in the area of these sites, NO MAINS SEWAGE in Nash. (All a cost to the Council if sites located here)

- GP4 - GENERAL DEVELOPMENT PRINCIPLES: HIGHWAYS & ACCESSIBILITY – Guidance for the design and setting of gypsy traveller sites required appropriate access for pedestrians, cyclists and public transport in accordance with national guidance. The area of Broadstreet Common where two sites are proposed have no pavements, and there is an issue with speeding drivers. Should pavements and pedestrian crossings be constructed, as required by the Good Practice Guide in Designing Gypsy/Traveller Sites in Wales, then these features are not features of a rural location and there is little room to put these in place and maintain an appropriate road width (as required by the good practice guidance) as the roads are constrained on both sides by reens.

- GP5 - GENERAL DEVELOPMENT PRINCIPLES: NATURAL ENVIRONMENT – This Policy is supposed to protect and encourage biodiversity and ecology connectivity and states there should be 'no unacceptable impact on landscape quality'. Draft LDP Paragraph 3.23, states in reference to SSSI (of which these sites are), 'these sites require the fullest regard to the intrinsic value of the site and their nature conservation value. Development with the potential to affect a recognised site will be closely scrutinised for any direct or indirect effects. The developer must demonstrate the case for development and why it could not be located on a site of less significance for nature conservation.' Please can the Council show this consideration process? The process for choosing sites does not seem to have been logical or consistent, some sites were dismissed in the first round of consideration due to being a SSSI or because they are in a flood plain, so why do two sites that are both in the flood zone and are SSSI status, amongst possessing others factors on which sites were dismissed, have ended up being draft LDP allocations.

- GP6 - GENERAL DEVELOPMENT PRINCIPLES: QUALITY OF DESIGN – It is difficult at present to assess the design concept of the sites as they have yet to reach application stage, but when considering the 'Good Practice Guide in Designing Gypsy Traveller Sites in Wales' and the necessary requirements for the sites, such as traffic calming measures not just within the site, but on the near by roads, lighting of the site and approaches to it and a minimum width of road to accommodate large towing caravans in both directions; these design factors are not possible in this location without causing major disruption and resulting in an rural area possessing urban characteristics, which would be contrary to this policy, and others in the plan.

- GP7 - GENERAL DEVELOPMENT PRINCIPLES: ENVIRONMENTAL PROTECTION & PUBLIC HEALTH – development should not 'cause harm to health because of land contamination, dust, noise, light pollution, flooding, water pollution or any other identified risk to the environment, local amenity or public health and safety', as stated by the Draft LDP Policy GP7. It is likely that such a future development has potential to harm either the sites residents or neighbouring residents through light pollution, water pollution, potential to effect flooding and the local drainage system of reens, and the environmental factors such biodiversity and ecology of protected species.

- GP8 – GENERAL DEVELOPMENT PRINCIPLES: ARCHAEOLOGY – The area is an 'Archaeological Sensitive Area' as identified by the LDP itself. Consideration needs to be given to this.

- CE3 – ROUTEWAYS, CORRIDORS & GATEWAYS – this policy states that the routes of future road ways need to be protected so not to preclude future road expansion. One site is within the 'protected zone' and the other immediately next to the M4 expansion route.

Therefore, there is potential that the gypsy/travellers would need to be moved in the future if the M4 were to be expanded – this would be more disruption and cost to the Council. Aside from this, guidance suggests that gypsy travellers should not be housed in areas of high noise or pollution – a site that could in the future be next to a motorway is likely to be both noisy and polluted from fumes.

- CE10 – ARCHAEOLOGICALLY SENSITIVE AREAS – Developments in this area require an archaeological impact assessment to be conducted. In locations such as Nash where there is potential for features to be below ground level, such surveys should be conducted early in the process so to ascertain both potential cost of mitigation and associated time delays. At present these surveys do not appear to have been conducted, which is common place, but in such a situation with LDP allocation, all sites allocated should be 'deliverable'.

- CE11 – CONSERVATION AREAS – None of the sites are within a Conservation Area, but the policy and supporting text of Draft LDP Para 4.37 references, 'The Gwent Levels which has been specifically recognised by the Wales Spatial Plan, are recognised in the LDP and proposed developments will be required to avoid the loss of such a finite resource'. How does the Sustainability Appraisal and Habitat Regulations Assessment of the Local

Development Plan assess the proposed gypsy/traveller sites considering the many environmental factors associated with the sites and the acknowledgement at National level that the Gwent Levels are worthy of special protection/ consideration?

- CE12 – LOCALLY DESIGNATED NATURE CONSERVATION & GEOLOGICAL SITES – The Gwent Levels are referenced within the Local Biodiversity Action Plan (LBAP) and identified as containing certain priority habitats and species, so according to Draft LDP Policy CE12, planning applications affecting these sites should be given serious consideration to ensure that these areas are not put at risk, either directly or indirectly.

- CE13: COASTAL ZONES – This Policy states 'Development will not be permitted in the coastal area or adjoining the tidal river' unless development is required to meet an exceptional need which cannot be accommodated elsewhere, requires a coastal location, and that the development is not sensitive to flooding. Both Broadstreet Common sites are within the coastal zone and in flood zone C1; additionally, these sites do not need to be in the coastal zone and alternative sites exist within the Borough and need to be explored further.

- H15: GYPSY & TRAVELLER TRANSIT ACCOMMODATION – objection to inclusion of the Queensway Meadows Site (H15 ii) in this policy as the site is inappropriate in this location, for reason set out in this document.

- H16: GYPSY & TRAVELLER RESIDENTIAL ACCOMMODATION - object to inclusion of the TWO sites at Pye Corner, Nash (H16 ii & iii) in this policy as the sites are inappropriate in this location, for reasons set out in this document.

Representation Details

by: Representation No

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• H17: GYPSY & TRAVELLER ACCOMMODATION PROPOSALS – Support this policy; but the three sites in Nash DO NOT COMPLY with this policy or the supporting text as the size of the population of just one site would have an overbearing impact on the village, if both sites come to fruition then this would have such an impact on the area of Nash, Goldcliff and Whitson, it is doubtful whether the village infrastructure, or lack of, could cope with this level of increase in population. The sites are not capable of being served by utilities or waste disposal and these are not capable of being provided in this area. It is questionable whether the sites are capable of being served by the emergency services at times of flood. The sites are within Flood Zone C1 and therefore in a high risk flood area, with caravans being particularly vulnerable. The sites also do not comply with various other draft LDP policies, as identified above, including the presence of European species protected by the Wildlife and Countryside Act (1981) (as amended) and by the EC Habitats Directive, such as otters, bats, badgers and various bird species.

The choice of sites for the gypsy travellers within the LDP does indicate a logical or understandable process for choosing the sites was undertaken, it is doubtful whether a proper search criteria was applied consistently across the local authority area. PPW, Edition 4, Para. 9.2.9 sets out criteria for the allocation of housing sites, many points of which include the need to be close to services and safe walking distances from primary schools and shops – this is not possible at H16 ii & iii, as there are no pavements or street lighting and the roads are bordered by deep drainage ditches filled with water, these present a drowning hazard to children and adults. The sites are located within a flood zone, there is no mains drainage or sewerage, and no mains gas supply; as well as the sites being SSSI designated for their rich ecological resources and protected species, some of which are protected under European legislation.

Good Practice Guidance in Designing Gypsy Traveller Sites in Wales – Reference is made to Chapter 3 – Site Design and Location, with specific reference to Paragraphs 3.2.5, 3.3.3, 3.4 and 3.5 as the allocated gypsy traveller sites in Broadstreet Common, Nash do not comply with the requirements for a gypsy traveller site. For this reason the H15 ii and H16 ii & iii should be removed from the Draft LDP, and new sites should be found taking into account the requirements listed in the good practice guidance document. Many of the recommendations contained within the good practice guidance are also contained within the 'Gypsy Traveller New Sites Grant 2011 – 2012 Guidance Note for Councils applying for a grant for such sites. From this guidance it suggests that sites not complying with the recommendations, are unlikely to be given funding. The identified sites in the LDP do not comply and therefore should not be taken forward as part of the LDP process. As the gypsy & traveller sites are contrary to the policies and guidance from European level through to a local level then they should not be allocated and be removed from the draft LDP. Ultimately the inclusion of these allocations within the LDP make the plan unsound, and should these sites be submitted as a planning application, 'theoretically' would not be approved as they are contrary to LDP policy! So it is questioned how have these sites reached this stage of the plan process as they should not have scored positively in your Strategic Environmental Assessment and Sustainability Appraisal?! I have grave concerns that the allocation and subsequent development of these sites would negatively affect the Gwent Levels and SSSI qualifying features and the ability of the Gwent Levels to be managed for biodiversity in the future. Sites H15 ii and H16 ii & iii are also contradictory to the guidance provided by yourselves in SPG, namely SPG – Wildlife and Development and SPG – Flood Risk and Sustainable Drainage Systems. It is understood that many of the issues highlighted in this objection letter are not total barriers to development and can possibly be overcome at a high cost and after much investigation and time, but there are such a multitude of issues affecting these sites that the cost to the tax payer and the Council, both monetary cost and time in an attempt to justify permitting a planning application the future could prove unobtainable. As there is such doubt over the deliver-ability of these sites, then it makes the Newport LDP unsound, as a Council can not put forward a plan for inspection and subsequent adoption when the deliver-ability of sites is in question. This doubt over the deliverability of the sites was in fact mentioned by Council officers at the LDP community consultation meeting that took place in Nash Village Hall in May. If Council officers, in fact the Head of Planning, are themselves openly stating that some of the gypsy traveller sites may not be deliverable, then the LDP allocation of gypsy traveller sites needs to be re-visited and the LDP process suspended until the issue has been resolved. I wish to be kept informed of the LDP process and would request to speak at the LDP Inquiry. I would also be grateful if you could acknowledge in writing the receipt of this representation.

Yours sincerely
Coral Ducroq

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3245.D3//H16.03	Ducroq, Ms Coral			29/06/2012	<input type="checkbox"/>	P	O		M	

Council Officer: LT

Document: Deposit Plan, p.72

Site: 416/ Former Army Camp

Delete Site

Policy: H16.03

Summary: Objection to site inclusion in the deposit plan for Gypsy and Traveller accommodation at Former Army Camp Site, Pye Corner, Nash.

<i>Item</i>	<i>Question</i>	<i>Representation Text</i>
2	2	Policy Number H16 iii
4	4	The Proposals Map Yes
11	11	Site Name former army camp
12	12	Site Reference h 16 iii

Representation Details

Newport City Council Local Development Plan

by: Representation No

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14	14	Representation								
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- H16 - Gypsy & Traveller Residential Accommodation (H16 (ii) Former army barracks & (iii) Former army camp site, both at Pye Corner, Nash).
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As stated above the inappropriate allocation of the gypsy & traveller sites within the LDP is not only contrary to National policy, technical advice notes, circulars, but also policies within your very own draft LDP, therefore there is no logical strategy to the allocation of sites, making the Newport LDP unsound. The sites are also contrary to advice provided within Welsh Government guidance provided to aid Councils in choosing such sites, but also contrary to WG guidance provided to Councils when seeking funding for the development of these sites. The area of Nash and the Gwent Levels has been recognised at national level for its special qualities for biodiversity, ecology, archaeology, history and for this reason the Gwent Levels and the area of Nash has been subject to restricted planning regulations, many of these features have been identified on the Draft LDP proposals and constraints maps, but have not been considered when allocating the sites on Broadstreet Common, Nash. Draft LDP Allocations H16 ii and iii are subject to the following planning restrictions:

- Outside the settlement limits
- Site of Special Scientific Interest (SSSI) - The site on Broadstreet Common (opposite Llwyn Derw) is within a SSSI, the other 2 sites are immediately adjacent to a SSSI. The Nash & Goldcliff SSSI – contains nationally rare and/or notable species of European protection status. SSSI's are a 'Statutory Nature Conservation Designation' of NATIONAL IMPORTANCE (Wildlife and Countryside Act, as amended by the Countryside & Rights of Way Act 2000). In the area of the two Nash sites the SSSI is designated due to the botanical and invertebrate interest of the reens.
- Identified as a Coastal & Floodplain Grazing Marsh (a Section 42 habitat under the Natural Environment & Rural Communities Act 2006). The area is identified as a habitat of Principle Importance for Conservation of Biological Diversity in Wales. The Coastal and Floodplain grazing marsh is defined as a Priority Habitat type in the UK Biodiversity Action Plan (UK BAP).
- The two sites in Nash are immediately adjacent to the Severn Estuary Special Protection Area (SPA), Special Area for Conservation (SAC) and Ramsar site.
- Landscape of Outstanding Historic Interest
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- Environment Agency (EA) Data identifies the whole area of Nash as at risk of flooding from rivers or seas and the area is subject to flood warning systems. EA data also shows that the area is at risk from flooding from rivers or sea without defences and the sites would be highly likely to be flooded during an extreme flood, including all access roads to the sites.
- Archaeologically Sensitive Area
- Special Landscape Area
- Undeveloped Coastal Zone
- 1 site within the M4 Protected corridor, the other immediately adjacent to it.
- No mains sewage in this part of Nash
- No mains drainage in this part of Nash
- No mains gas, most people use oil or coal
- Area classified as Coastal & Floodplain Grazing Marsh (a section 42 habitat under the Natural Environment & Rural Communities Act 2006). A habitat of Principle Importance for Conservation of Biological Diversity in Wales.
- Badges, Otter, Bats, Great Crested Newts, Water voles – all present and recorded in the area, and are protected by the Wildlife and Countryside Act (1981), and are UK BAP species.
- LANDMAP ASSESSMENT – CCW's Landmap assessment has analysed the sites in question and has produced the following assessment of the landscape quality, reference to the importance of LANDMAP is provided by PPW, Edition 4, Para 5.3.13. Landscape rating: OUTSTANDING – 'Gwent levels are one of the most extensive areas of reclaimed wet pasture in the UK.

They are rich in plant species and communities due to the variety of reed types and their management. A number of nationally rare plant species and invertebrates are recorded from this section of the Levels.'

Visual & Sensory rating: HIGH – 'The Levels are rare, distinctive landscape of rectangular and sinuous fieldscapes

with reens, hedges, and field boundary trees and attractive settlements and farmhouse with a strong sense of place. It would be of outstanding value if there were not some degrading of the landscape

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Due to sensitive location of these sites, and above listed features, each of which carries its own restrictions, sites H15(ii), H16(ii & iii) and policy H17 are contrary to the following draft LDP policies:

- SP1 – SUSTAINABILITY - sites are in the countryside, not sustainable due to rural location with limited bus services, distance from health facilities. It is acknowledged that the Council are using the 'rural exception' policy to the allocation of the gypsy/traveller sites – reluctantly accepting this, sites should still be sustainable, these sites are not; further details given below.
- SP3 – FLOOD RISK – located within Floodzone C1. According to TAN 15 (Development & Flood Risk) new development should be directed away from those areas which are at high risk of flooding (TAN15, Para 3.1) and caravans are classified as 'highly vulnerable development' and at high risk during times of flood (TAN15, Para. TAN 15, Figure2). TAN 15, Para 11.2, states that the 'instability of caravans places their occupants, and others, at special risk and it may be difficult to operate an effective flood warning system'. Developments should be designed to cope with the threat and consequences of flooding – how do you do that here without incurring INCREDIBLE costs, and are the solutions actually practical and workable. The raising of the land above flood level does not solve problem as the access roads to the site are also below sea level, so do they propose to raise the level of ALL surrounding roads. If not then at a time of flood emergency services (police, ambulance, fire) would not reach the site, whilst the residents are 'sat on an island!' TAN15 requires local authorities to 'fully explain and justify the reasons for allocating a site within zone C.....A proposed allocation should not be made if the consequences of a flooding event cannot be effectively managed.' I have seen no evidence to show that the Council have looked in detail at the flooding issues, that the consequences would be acceptable or that emergency services could access the site at times of flood. Has a Flood Consequence Assessment been conducted? If so, this has not been made available during the public consultation period. PPW, Edition 4, Para. 13.2.1 – 13.4.4, provides a vast amount of guidance on flood risk and development, the allocated sites within the floodplain are contrary to this guidance, and advises that authorities take a precautionary approach when allocating sites – it is not clear that Newport CC have taken such a precautionary approach, nor that development of the scale proposed would not effect flooding/drainage issues on the immediate vicinity or further afield along The Levels.
- SP5 – COUNTRYSIDE – sites outside the settlement limits, therefore in the countryside. As previously mentioned, it is acknowledged that the Council have used their discretion to allocate these sites in the countryside as 'rural exception sites', but aside from this the other factors mentioned in Policy SP5 should be considered, it is clear they have not. Consideration should be given to appropriate uses in the countryside, respect and enhancement of the landscape character and biodiversity of the immediate and surrounding area and it should be appropriate in scale and design. Considering the number of 'pitches' proposed on both the permanent and transient sites (either separately or together) would be vastly out of character and scale for a rural area, and an area not even within the village boundary. The number of people that would live at these sites would almost increase the population of the village by 50%, this is an increase that a rural area with no shops, doctors, local primary school and no mains drainage, or gas supply could sustain, unless substantial investment in infrastructure is put in place. Draft LDP Policy SP5, Para. 2.26 states that 'the countryside has value for landscapes, natural resources, agriculture, ecology, geology, history, archaeology and outdoor recreation. It will rarely be appropriate location for development, except where this is for specific benefit of the rural economy.' How is the allocation of such large sites, which are not be suitable for brick and mortar residential accommodation of this scale be suitable for a large number of caravans and still protect or enhance the ecology, archaeology, history and recreational value of a rural area? The two Broadstreet Common sites are contradictory to the advice given in PPW, Edition 4, Para 4.6.8, which advises that development should only be located within the settlement limits where it can be 'best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It also states that new development should respect the local character and scale of the surroundings; the intensive development of these sites is not respecting the local scale of a rural community where residential densities are low. Therefore the allocation of sites H16 (ii & ii) is contrary to advice within PPW and therefore makes your LDP unsound.
- SP8 – SPECIAL LANDSCAPE AREA (SLA) – As part of the Caldicot Levels, the sites and the wider area of Nash are designated as an SLA, draft LDP Policy SP8 requires development in these areas to 'contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features'. At this point in time I have seen information justifying how the allocation of these sites would 'contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features', or how the sites would 'ensure that proposals do not impact or affect the intrinsic character quality, feature and conservation value of the SLA' (Draft LDP Para. 2.32).
- SP9 – CONSERVATION OF THE NATURAL, HISTORIC & BUILT ENVIRONMENT – The sites are located within SSSI, Special Landscape Areas and these designated sites have important environmental resources, and the Council has a duty under various legislation including the Natural Environmental and Rural Communities Act (2006), Conservation of Habitats and Species Regulations (2010), Countryside and Rights of Way Act (2000) and the Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations (1999) to ensure that they are protected from inappropriate or damaging development. 'The protection, retention safeguarding, conservation and enhancement of heritage assets will be sought, and where new development is proposed that affects the building or site or its setting, this should be of the highest quality' (LDP Para 2.34). Justification needs to be provided to show how the allocation of these sites complies with the above Acts and legislation – as yet this justification has not been provided.
- GP1 – GENERAL DEVELOPMENT PRINCIPLES: CLIMATE CHANGE – LDP Draft LDP Paragraph 3.4 states that 'flood risk is a key concern for Newport due to its coastal proximity and its location on the River Usk'. Whilst Para. 3.5 states that 'Development will be directed away from flood risk areas...'. Both sites on Broadstreet Common are located within Flood zone C1.
- GP2 – GENERAL DEVELOPMENT PRINCIPLES: GENERAL AMENITY – Policy GP2 states development permitted only where there will be no significant effect on local amenity, no effect on noise, disturbance, privacy, overbearing, light, odours and air quality. Para 3.11 states that 'The scale, nature and sighting of a proposal must be appropriate to the location and must not undermine the character of either the site or the locality.' (The equivalent of a new village population on the small village of Nash would significantly harm the character of a rural area, the facilities would not cope,

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lighting that is required for access into and on these traveller sites would be uncharacteristic to a rural area that does not have street lighting, also this would have significant effect on the wildlife in the area such as fish, invertebrates, otter, badger & bat that are all present on the sites and in the reens surrounding the sites, thus all resulting in a massive cumulative overbearing impact on the surroundings.

- GP3 - GENERAL DEVELOPMENT PRINCIPLES: SERVICE INFRASTRUCTURE – Only small parts of Nash are on mains gas supply - NOT in the area of these sites, NO MAINS SEWAGE in Nash. (All a cost to the Council if sites located here)

- GP4 - GENERAL DEVELOPMENT PRINCIPLES: HIGHWAYS & ACCESSIBILITY – Guidance for the design and setting of gypsy traveller sites required appropriate access for pedestrians, cyclists and public transport in accordance with national guidance. The area of Broadstreet Common where two sites are proposed have no pavements, and there is an issue with speeding drivers. Should pavements and pedestrian crossings be constructed, as required by the Good Practice Guide in Designing Gypsy/Traveller Sites in Wales, then these features are not features of a rural location and there is little room to put these in place and maintain an appropriate road width (as required by the good practice guidance) as the roads are constrained on both sides by reens.

- GP5 - GENERAL DEVELOPMENT PRINCIPLES: NATURAL ENVIRONMENT – This Policy is supposed to protect and encourage biodiversity and ecology connectivity and states there should be 'no unacceptable impact on landscape quality'. Draft LDP Paragraph 3.23, states in reference to SSSI (of which these sites are), 'these sites require the fullest regard to the intrinsic value of the site and their nature conservation value. Development with the potential to affect a recognised site will be closely scrutinised for any direct or indirect effects. The developer must demonstrate the case for development and why it could not be located on a site of less significance for nature conservation.' Please can the Council show this consideration process? The process for choosing sites does not seem to have been logical or consistent, some sites were dismissed in the first round of consideration due to being a SSSI or because they are in a flood plain, so why do two sites that are both in the flood zone and are SSSI status, amongst possessing others factors on which sites were dismissed, have ended up being draft LDP allocations.

- GP6 - GENERAL DEVELOPMENT PRINCIPLES: QUALITY OF DESIGN – It is difficult at present to assess the design concept of the sites as they have yet to reach application stage, but when considering the 'Good Practice Guide in Designing Gypsy Traveller Sites in Wales' and the necessary requirements for the sites, such as traffic calming measures not just within the site, but on the near by roads, lighting of the site and approaches to it and a minimum width of road to accommodate large towing caravans in both directions; these design factors are not possible in this location without causing major disruption and resulting in an rural area possessing urban characteristics, which would be contrary to this policy, and others in the plan.

- GP7 - GENERAL DEVELOPMENT PRINCIPLES: ENVIRONMENTAL PROTECTION & PUBLIC HEALTH – development should not 'cause harm to health because of land contamination, dust, noise, light pollution, flooding, water pollution or any other identified risk to the environment, local amenity or public health and safety', as stated by the Draft LDP Policy GP7. It is likely that such a future development has potential to harm either the sites residents or neighbouring residents through light pollution, water pollution, potential to effect flooding and the local drainage system of reens, and the environmental factors such biodiversity and ecology of protected species.

- GP8 – GENERAL DEVELOPMENT PRINCIPLES: ARCHAEOLOGY – The area is an 'Archaeological Sensitive Area' as identified by the LDP itself. Consideration needs to be given to this.

- CE3 – ROUTEWAYS, CORRIDORS & GATEWAYS – this policy states that the routes of future road ways need to be protected so not to preclude future road expansion. One site is within the 'protected zone' and the other immediately next to the M4 expansion route.

Therefore, there is potential that the gypsy/travellers would need to be moved in the future if the M4 were to be expanded – this would be more disruption and cost to the Council. Aside from this, guidance suggests that gypsy travellers should not be housed in areas of high noise or pollution – a site that could in the future be next to a motorway is likely to be both noisy and polluted from fumes.

- CE10 – ARCHAEOLOGICALLY SENSITIVE AREAS – Developments in this area require an archaeological impact assessment to be conducted. In locations such as Nash where there is potential for features to be below ground level, such surveys should be conducted early in the process so to ascertain both potential cost of mitigation and associated time delays. At present these surveys do not appear to have been conducted, which is common place, but in such a situation with LDP allocation, all sites allocated should be 'deliverable'.

- CE11 – CONSERVATION AREAS – None of the sites are within a Conservation Area, but the policy and supporting text of Draft LDP Para 4.37 references, 'The Gwent Levels which has been specifically recognised by the Wales Spatial Plan, are recognised in the LDP and proposed developments will be required to avoid the loss of such a finite resource'. How does the Sustainability Appraisal and Habitat Regulations Assessment of the Local

Development Plan assess the proposed gypsy/traveller sites considering the many environmental factors associated with the sites and the acknowledgement at National level that the Gwent Levels are worthy of special protection/ consideration?

- CE12 – LOCALLY DESIGNATED NATURE CONSERVATION & GEOLOGICAL SITES – The Gwent Levels are referenced within the Local Biodiversity Action Plan (LBAP) and identified as containing certain priority habitats and species, so according to Draft LDP Policy CE12, planning applications affecting these sites should be given serious consideration to ensure that these areas are not put at risk, either directly or indirectly.

- CE13: COASTAL ZONES – This Policy states 'Development will not be permitted in the coastal area or adjoining the tidal river' unless development is required to meet an exceptional need which cannot be accommodated elsewhere, requires a coastal location, and that the development is not sensitive to flooding. Both Broadstreet Common sites are within the coastal zone and in flood zone C1; additionally, these sites do not need to be in the coastal zone and alternative sites exist within the Borough and need to be explored further.

- H15: GYPSY & TRAVELLER TRANSIT ACCOMMODATION – objection to inclusion of the Queensway Meadows Site (H15 ii) in this policy as the site is inappropriate in this location, for reason set out in this document.

- H16: GYPSY & TRAVELLER RESIDENTIAL ACCOMMODATION - object to inclusion of the TWO sites at Pye Corner, Nash (H16 ii & iii) in this policy as the sites are inappropriate in this location, for reasons set out in this document.

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• H17: GYPSY & TRAVELLER ACCOMMODATION PROPOSALS – Support this policy; but the three sites in Nash DO NOT COMPLY with this policy or the supporting text as the size of the population of just one site would have an overbearing impact on the village, if both sites come to fruition then this would have such an impact on the area of Nash, Goldcliff and Whitson, it is doubtful whether the village infrastructure, or lack of, could cope with this level of increase in population. The sites are not capable of being served by utilities or waste disposal and these are not capable of being provided in this area. It is questionable whether the sites are capable of being served by the emergency services at times of flood. The sites are within Flood Zone C1 and therefore in a high risk flood area, with caravans being particularly vulnerable. The sites also do not comply with various other draft LDP policies, as identified above, including the presence of European species protected by the Wildlife and Countryside Act (1981) (as amended) and by the EC Habitats Directive, such as otters, bats, badgers and various bird species.

The choice of sites for the gypsy travellers within the LDP does indicate a logical or understandable process for choosing the sites was undertaken, it is doubtful whether a proper search criteria was applied consistently across the local authority area. PPW, Edition 4, Para. 9.2.9 sets out criteria for the allocation of housing sites, many points of which include the need to be close to services and safe walking distances from primary schools and shops – this is not possible at H16 ii & iii, as there are no pavements or street lighting and the roads are bordered by deep drainage ditches filled with water, these present a drowning hazard to children and adults. The sites are located within a flood zone, there is no mains drainage or sewerage, and no mains gas supply; as well as the sites being SSSI designated for their rich ecological resources and protected species, some of which are protected under European legislation.

Good Practice Guidance in Designing Gypsy Traveller Sites in Wales – Reference is made to Chapter 3 – Site Design and Location, with specific reference to Paragraphs 3.2.5, 3.3.3, 3.4 and 3.5 as the allocated gypsy traveller sites in Broadstreet Common, Nash do not comply with the requirements for a gypsy traveller site. For this reason the H15 ii and H16 ii & iii should be removed from the Draft LDP, and new sites should be found taking into account the requirements listed in the good practice guidance document. Many of the recommendations contained within the good practice guidance are also contained within the 'Gypsy Traveller New Sites Grant 2011 – 2012 Guidance Note for Councils applying for a grant for such sites. From this guidance it suggests that sites not complying with the recommendations, are unlikely to be given funding. The identified sites in the LDP do not comply and therefore should not be taken forward as part of the LDP process. As the gypsy & traveller sites are contrary to the policies and guidance from European level through to a local level then they should not be allocated and be removed from the draft LDP. Ultimately the inclusion of these allocations within the LDP make the plan unsound, and should these sites be submitted as a planning application, 'theoretically' would not be approved as they are contrary to LDP policy! So it is questioned how have these sites reached this stage of the plan process as they should not have scored positively in your Strategic Environmental Assessment and Sustainability Appraisal?! I have grave concerns that the allocation and subsequent development of these sites would negatively affect the Gwent Levels and SSSI qualifying features and the ability of the Gwent Levels to be managed for biodiversity in the future. Sites H15 ii and H16 ii & iii are also contradictory to the guidance provided by yourselves in SPG, namely SPG – Wildlife and Development and SPG – Flood Risk and Sustainable Drainage Systems. It is understood that many of the issues highlighted in this objection letter are not total barriers to development and can possibly be overcome at a high cost and after much investigation and time, but there are such a multitude of issues affecting these sites that the cost to the tax payer and the Council, both monetary cost and time in an attempt to justify permitting a planning application the future could prove unobtainable. As there is such doubt over the deliver-ability of these sites, then it makes the Newport LDP unsound, as a Council can not put forward a plan for inspection and subsequent adoption when the deliver-ability of sites is in question. This doubt over the deliverability of the sites was in fact mentioned by Council officers at the LDP community consultation meeting that took place in Nash Village Hall in May. If Council officers, in fact the Head of Planning, are themselves openly stating that some of the gypsy traveller sites may not be deliverable, then the LDP allocation of gypsy traveller sites needs to be re-visited and the LDP process suspended until the issue has been resolved. I wish to be kept informed of the LDP process and would request to speak at the LDP Inquiry. I would also be grateful if you could acknowledge in writing the receipt of this representation.

Yours sincerely
Coral Ducroq

15 15 Do you want to speak at Public Examination?

Neither

Item Question *Soundness Test*

1 1 I think the LDP is sound.

Neither

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

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Council Officer: LT

Document:Deposit Plan, p.72

Policy: H17

Summary: Support for criteria based policy on Gypsy and Traveller accommodation

Item Question *Representation Text*

2 2 Policy Number
h17

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14	14	Representation								
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Please find below my objections to the Draft Newport Local Development Plan.

From reading the Draft Newport LDP, I would like to object to several policies and proposed allocated sites, as the LDP is felt to be unsound. The reason for my objections are set out below, but I would also like to highlight that I feel the LDP is contrary to five of the LDP 'Test of Soundness', as follows:

- LDP does not have regard to relevant plans, policies and strategies relating to the area or adjoining areas – Test of Soundness C1
- LDP does not have regard to national policy – Test of Soundness C2
- LDP does not have regard to the Wales Spatial Plan – Test of Soundness C3
- LDP does not have a coherent strategy from which policies and allocations logically flow - Test of Soundness CE 1
- LDP strategy, policies and allocations are not realistic or appropriate and they are not founded on a robust and credible evidence base. The principle reasons for feeling the Newport LDP is unsound relate to the inappropriate allocation of Gypsy and Traveller Sites, primarily those in Nash (2 sites on Broadstreet Common, and one site at Queensway Meadows), and therefore I am objecting to LDP policies:
- H15 - Gypsy & Traveller Transit Accommodation (H15 (ii) – Queensway Meadows)
- H16 - Gypsy & Traveller Residential Accommodation (H16 (ii) Former army barracks & (iii) Former army camp site, both at Pye Corner, Nash).
- H17 – Gypsy & Traveller Accommodation Proposals.

As stated above the inappropriate allocation of the gypsy & traveller sites within the LDP is not only contrary to National policy, technical advice notes, circulars, but also policies within your very own draft LDP, therefore there is no logical strategy to the allocation of sites, making the Newport LDP unsound. The sites are also contrary to advice provided within Welsh Government guidance provided to aid Councils in choosing such sites, but also contrary to WG guidance provided to Councils when seeking funding for the development of these sites. The area of Nash and the Gwent Levels has been recognised at national level for its special qualities for biodiversity, ecology, archaeology, history and for this reason the Gwent Levels and the area of Nash has been subject to restricted planning regulations, many of these features have been identified on the Draft LDP proposals and constraints maps, but have not been considered when allocating the sites on Broadstreet Common, Nash. Draft LDP Allocations H16 ii and iii are subject to the following planning restrictions:

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- No mains drainage in this part of Nash
- No mains gas, most people use oil or coal
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Due to sensitive location of these sites, and above listed features, each of which carries its own restrictions, sites H15(ii), H16(ii & iii) and policy H17 are contrary to the following draft LDP policies:

- SP1 – SUSTAINABILITY - sites are in the countryside, not sustainable due to rural location with limited bus services, distance from health facilities. It is acknowledged that the Council are using the 'rural exception' policy to the allocation of the gypsy/traveller sites – reluctantly accepting this, sites should still be sustainable, these sites are not; further details given below.
- SP3 – FLOOD RISK – located within Floodzone C1. According to TAN 15 (Development & Flood Risk) new development should be directed away from those areas which are at high risk of flooding (TAN15, Para 3.1) and caravans are classified as 'highly vulnerable development' and at high risk during times of flood (TAN15, Para. TAN 15, Figure2). TAN 15, Para 11.2, states that the 'instability of caravans places their occupants, and others, at special risk and it may be difficult to operate an effective flood warning system'. Developments should be designed to cope with the threat and consequences of flooding – how do you do that here without incurring INCREDIBLE costs, and are the solutions actually practical and workable. The raising of the land above flood level does not solve problem as the access roads to the site are also below sea level, so do they propose to raise the level of ALL surrounding roads. If not then at a time of flood emergency services (police, ambulance, fire) would not reach the site, whilst the residents are 'sat on an island!' TAN15 requires local authorities to 'fully explain and justify the reasons for allocating a site within zone C.....A proposed allocation should not be made if the consequences of a flooding event cannot be effectively managed.' I have seen no evidence to show that the Council have looked in detail at the flooding issues, that the consequences would be acceptable or that emergency services could access the site at times of flood. Has a Flood Consequence Assessment been conducted? If so, this has not been made available during the public consultation period. PPW, Edition 4, Para. 13.2.1 – 13.4.4, provides a vast amount of guidance on flood risk and development, the allocated sites within the floodplain are contrary to this guidance, and advises that authorities take a precautionary approach when allocating sites – it is not clear that Newport CC have taken such a precautionary approach, nor that development of the scale proposed would not effect flooding/drainage issues on the immediate vicinity or further afield along The Levels.
- SP5 – COUNTRYSIDE – sites outside the settlement limits, therefore in the countryside. As previously mentioned, it is acknowledged that the Council have used their discretion to allocate these sites in the countryside as 'rural exception sites', but aside from this the other factors mentioned in Policy SP5 should be considered, it is clear they have not. Consideration should be given to appropriate uses in the countryside, respect and enhancement of the landscape character and biodiversity of the immediate and surrounding area and it should be appropriate in scale and design. Considering the number of 'pitches' proposed on both the permanent and transient sites (either separately or together) would be vastly out of character and scale for a rural area, and an area not even within the village boundary. The number of people that would live at these sites would almost increase the population of the village by 50%, this is an increase that a rural area with no shops, doctors, local primary school and no mains drainage, or gas supply could sustain, unless substantial investment in infrastructure is put in place. Draft LDP Policy SP5, Para. 2.26 states that 'the countryside has value for landscapes, natural resources, agriculture, ecology, geology, history, archaeology and outdoor recreation. It will rarely be appropriate location for development, except where this is for specific benefit of the rural economy.' How is the allocation of such large sites, which are not be suitable for brick and mortar residential accommodation of this scale be suitable for a large number of caravans and still protect or enhance the ecology, archaeology, history and recreational value of a rural area? The two Broadstreet Common sites are contradictory to the advice given in PPW, Edition 4, Para 4.6.8, which advises that development should only be located within the settlement limits where it can be 'best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It also states that new development should respect the local character and scale of the surroundings; the intensive development of these sites is not respecting the local scale of a rural community where residential densities are low. Therefore the allocation of sites H16 (ii & ii) is contrary to advice within PPW and therefore makes your LDP unsound.
- SP8 – SPECIAL LANDSCAPE AREA (SLA) – As part of the Caldicot Levels, the sites and the wider area of Nash are designated as an SLA, draft LDP Policy SP8 requires development in these areas to 'contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features'. At this point in time I have seen information justifying how the allocation of these sites would 'contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features', or how the sites would 'ensure that proposals do not impact or affect the intrinsic character quality, feature and conservation value of the SLA' (Draft LDP Para. 2.32).
- SP9 – CONSERVATION OF THE NATURAL, HISTORIC & BUILT ENVIRONMENT – The sites are located within SSSI, Special Landscape Areas and these designated sites have important environmental resources, and the Council has a duty under various legislation including the Natural Environmental and Rural Communities Act (2006), Conservation of Habitats and Species Regulations (2010), Countryside and Rights of Way Act (2000) and the Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations (1999) to ensure that they are protected from inappropriate or damaging development. 'The protection, retention safeguarding, conservation and enhancement of heritage assets will be sought, and where new development is proposed that affects the building or site or its setting, this should be of the highest quality' (LDP Para 2.34). Justification needs to be provided to show how the allocation of these sites complies with the above Acts and legislation – as yet this justification has not been provided.
- GP1 – GENERAL DEVELOPMENT PRINCIPLES: CLIMATE CHANGE – LDP Draft LDP Paragraph 3.4 states that 'flood risk is a key concern for Newport due to its coastal proximity and its location on the River Usk'. Whilst Para. 3.5 states that 'Development will be directed away from flood risk areas...'. Both sites on Broadstreet Common are located within Flood zone C1.
- GP2 – GENERAL DEVELOPMENT PRINCIPLES: GENERAL AMENITY – Policy GP2 states development permitted only where there will be no significant effect on local amenity, no effect on noise, disturbance, privacy, overbearing, light, odours and air quality. Para 3.11 states that 'The scale, nature and sighting of a proposal must be appropriate to the location and must not undermine the character of either the site or the locality.' (The equivalent of a new village population on the small village of Nash would significantly harm the character of a rural area, the facilities would not cope,

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by: Representation No

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lighting that is required for access into and on these traveller sites would be uncharacteristic to a rural area that does not have street lighting, also this would have significant effect on the wildlife in the area such as fish, invertebrates, otter, badger & bat that are all present on the sites and in the reens surrounding the sites, thus all resulting in a massive cumulative overbearing impact on the surroundings.

- GP3 - GENERAL DEVELOPMENT PRINCIPLES: SERVICE INFRASTRUCTURE – Only small parts of Nash are on mains gas supply - NOT in the area of these sites, NO MAINS SEWAGE in Nash. (All a cost to the Council if sites located here)
- GP4 - GENERAL DEVELOPMENT PRINCIPLES: HIGHWAYS & ACCESSIBILITY – Guidance for the design and setting of gypsy traveller sites required appropriate access for pedestrians, cyclists and public transport in accordance with national guidance. The area of Broadstreet Common where two sites are proposed have no pavements, and there is an issue with speeding drivers. Should pavements and pedestrian crossings be constructed, as required by the Good Practice Guide in Designing Gypsy/Traveller Sites in Wales, then these features are not features of a rural location and there is little room to put these in place and maintain an appropriate road width (as required by the good practice guidance) as the roads are constrained on both sides by reens.
- GP5 - GENERAL DEVELOPMENT PRINCIPLES: NATURAL ENVIRONMENT – This Policy is supposed to protect and encourage biodiversity and ecology connectivity and states there should be 'no unacceptable impact on landscape quality'. Draft LDP Paragraph 3.23, states in reference to SSSI (of which these sites are), 'these sites require the fullest regard to the intrinsic value of the site and their nature conservation value. Development with the potential to affect a recognised site will be closely scrutinised for any direct or indirect effects. The developer must demonstrate the case for development and why it could not be located on a site of less significance for nature conservation.' Please can the Council show this consideration process? The process for choosing sites does not seem to have been logical or consistent, some sites were dismissed in the first round of consideration due to being a SSSI or because they are in a flood plain, so why do two sites that are both in the flood zone and are SSSI status, amongst possessing others factors on which sites were dismissed, have ended up being draft LDP allocations.
- GP6 - GENERAL DEVELOPMENT PRINCIPLES: QUALITY OF DESIGN – It is difficult at present to assess the design concept of the sites as they have yet to reach application stage, but when considering the 'Good Practice Guide in Designing Gypsy Traveller Sites in Wales' and the necessary requirements for the sites, such as traffic calming measures not just within the site, but on the near by roads, lighting of the site and approaches to it and a minimum width of road to accommodate large towing caravans in both directions; these design factors are not possible in this location without causing major disruption and resulting in an rural area possessing urban characteristics, which would be contrary to this policy, and others in the plan.
- GP7 - GENERAL DEVELOPMENT PRINCIPLES: ENVIRONMENTAL PROTECTION & PUBLIC HEALTH – development should not 'cause harm to health because of land contamination, dust, noise, light pollution, flooding, water pollution or any other identified risk to the environment, local amenity or public health and safety', as stated by the Draft LDP Policy GP7. It is likely that such a future development has potential to harm either the sites residents or neighbouring residents through light pollution, water pollution, potential to effect flooding and the local drainage system of reens, and the environmental factors such biodiversity and ecology of protected species.
- GP8 – GENERAL DEVELOPMENT PRINCIPLES: ARCHAEOLOGY – The area is an 'Archaeological Sensitive Area' as identified by the LDP itself. Consideration needs to be given to this.
- CE3 – ROUTEWAYS, CORRIDORS & GATEWAYS – this policy states that the routes of future road ways need to be protected so not to preclude future road expansion. One site is within the 'protected zone' and the other immediately next to the M4 expansion route.
Therefore, there is potential that the gypsy/travellers would need to be moved in the future if the M4 were to be expanded – this would be more disruption and cost to the Council. Aside from this, guidance suggests that gypsy travellers should not be housed in areas of high noise or pollution – a site that could in the future be next to a motorway is likely to be both noisy and polluted from fumes.
- CE10 – ARCHAEOLOGICALLY SENSITIVE AREAS – Developments in this area require an archaeological impact assessment to be conducted. In locations such as Nash where there is potential for features to be below ground level, such surveys should be conducted early in the process so to ascertain both potential cost of mitigation and associated time delays. At present these surveys do not appear to have been conducted, which is common place, but in such a situation with LDP allocation, all sites allocated should be 'deliverable'.
- CE11 – CONSERVATION AREAS – None of the sites are within a Conservation Area, but the policy and supporting text of Draft LDP Para 4.37 references, 'The Gwent Levels which has been specifically recognised by the Wales Spatial Plan, are recognised in the LDP and proposed developments will be required to avoid the loss of such a finite resource'. How does the Sustainability Appraisal and Habitat Regulations Assessment of the Local Development Plan assess the proposed gypsy/traveller sites considering the many environmental factors associated with the sites and the acknowledgement at National level that the Gwent Levels are worthy of special protection/ consideration?
- CE12 – LOCALLY DESIGNATED NATURE CONSERVATION & GEOLOGICAL SITES – The Gwent Levels are referenced within the Local Biodiversity Action Plan (LBAP) and identified as containing certain priority habitats and species, so according to Draft LDP Policy CE12, planning applications affecting these sites should be given serious consideration to ensure that these areas are not put at risk, either directly or indirectly.
- CE13: COASTAL ZONES – This Policy states 'Development will not be permitted in the coastal area or adjoining the tidal river' unless development is required to meet an exceptional need which cannot be accommodated elsewhere, requires a coastal location, and that the development is not sensitive to flooding. Both Broadstreet Common sites are within the coastal zone and in flood zone C1; additionally, these sites do not need to be in the coastal zone and alternative sites exist within the Borough and need to be explored further.
- H15: GYPSY & TRAVELLER TRANSIT ACCOMMODATION – objection to inclusion of the Queensway Meadows Site (H15 ii) in this policy as the site is inappropriate in this location, for reason set out in this document.
- H16: GYPSY & TRAVELLER RESIDENTIAL ACCOMMODATION - object to inclusion of the TWO sites at Pye Corner, Nash (H16 ii & iii) in this policy as the sites are inappropriate in this location, for reasons set out in this document.

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• H17: GYPSY & TRAVELLER ACCOMMODATION PROPOSALS – Support this policy; but the three sites in Nash DO NOT COMPLY with this policy or the supporting text as the size of the population of just one site would have an overbearing impact on the village, if both sites come to fruition then this would have such an impact on the area of Nash, Goldcliff and Whitson, it is doubtful whether the village infrastructure, or lack of, could cope with this level of increase in population. The sites are not capable of being served by utilities or waste disposal and these are not capable of being provided in this area. It is questionable whether the sites are capable of being served by the emergency services at times of flood. The sites are within Flood Zone C1 and therefore in a high risk flood area, with caravans being particularly vulnerable. The sites also do not comply with various other draft LDP policies, as identified above, including the presence of European species protected by the Wildlife and Countryside Act (1981) (as amended) and by the EC Habitats Directive, such as otters, bats, badgers and various bird species.

The choice of sites for the gypsy travellers within the LDP does indicate a logical or understandable process for choosing the sites was undertaken, it is doubtful whether a proper search criteria was applied consistently across the local authority area. PPW, Edition 4, Para. 9.2.9 sets out criteria for the allocation of housing sites, many points of which include the need to be close to services and safe walking distances from primary schools and shops – this is not possible at H16 ii & iii, as there are no pavements or street lighting and the roads are bordered by deep drainage ditches filled with water, these present a drowning hazard to children and adults. The sites are located within a flood zone, there is no mains drainage or sewerage, and no mains gas supply; as well as the sites being SSSI designated for their rich ecological resources and protected species, some of which are protected under European legislation.

Good Practice Guidance in Designing Gypsy Traveller Sites in Wales – Reference is made to Chapter 3 – Site Design and Location, with specific reference to Paragraphs 3.2.5, 3.3.3, 3.4 and 3.5 as the allocated gypsy traveller sites in Broadstreet Common, Nash do not comply with the requirements for a gypsy traveller site. For this reason the H15 ii and H16 ii & iii should be removed from the Draft LDP, and new sites should be found taking into account the requirements listed in the good practice guidance document. Many of the recommendations contained within the good practice guidance are also contained within the 'Gypsy Traveller New Sites Grant 2011 – 2012 Guidance Note for Councils applying for a grant for such sites. From this guidance it suggests that sites not complying with the recommendations, are unlikely to be given funding. The identified sites in the LDP do not comply and therefore should not be taken forward as part of the LDP process. As the gypsy & traveller sites are contrary to the policies and guidance from European level through to a local level then they should not be allocated and be removed from the draft LDP. Ultimately the inclusion of these allocations within the LDP make the plan unsound, and should these sites be submitted as a planning application, 'theoretically' would not be approved as they are contrary to LDP policy! So it is questioned how have these sites reached this stage of the plan process as they should not have scored positively in your Strategic Environmental Assessment and Sustainability Appraisal?! I have grave concerns that the allocation and subsequent development of these sites would negatively affect the Gwent Levels and SSSI qualifying features and the ability of the Gwent Levels to be managed for biodiversity in the future. Sites H15 ii and H16 ii & iii are also contradictory to the guidance provided by yourselves in SPG, namely SPG – Wildlife and Development and SPG – Flood Risk and Sustainable Drainage Systems. It is understood that many of the issues highlighted in this objection letter are not total barriers to development and can possibly be overcome at a high cost and after much investigation and time, but there are such a multitude of issues affecting these sites that the cost to the tax payer and the Council, both monetary cost and time in an attempt to justify permitting a planning application the future could prove unobtainable. As there is such doubt over the deliver-ability of these sites, then it makes the Newport LDP unsound, as a Council can not put forward a plan for inspection and subsequent adoption when the deliver-ability of sites is in question. This doubt over the deliverability of the sites was in fact mentioned by Council officers at the LDP community consultation meeting that took place in Nash Village Hall in May. If Council officers, in fact the Head of Planning, are themselves openly stating that some of the gypsy traveller sites may not be deliverable, then the LDP allocation of gypsy traveller sites needs to be re-visited and the LDP process suspended until the issue has been resolved. I wish to be kept informed of the LDP process and would request to speak at the LDP Inquiry. I would also be grateful if you could acknowledge in writing the receipt of this representation.

Yours sincerely
Coral Ducroq

15 15 Do you want to speak at Public Examination?

Neither

Item Question Soundness Test

1 1 I think the LDP is sound.

Neither

Item Question

Tick-box reply

10 10 Delete an existing site.

Yes

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3266.D1//SP21	Newport Friends of the Earth			10/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.33

Site: 424/ South of Llanwern Steelworks

Delete Site

Policy: SP21

Summary: Objection to Policy SP21 - Waste Management

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number SP21	
11 11	Site Name Llanwern	
14 14	Representation All references to a regional waste disposal or processing site at Llanwern should be removed. Any implication that the Plan will support the construction of a mass-burn incinerator. Any reference to a strategy based on Prosiect Gwyrdd's current shortlist. Incineration is not the Best Practicable Environmental Option (Section SP21).	
15 15	Do you want to speak at Public Examination?	Neither
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
<i>Item Question</i>		<i>Tick-box reply</i>
6 6	A new policy	Yes

Representation Details

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
3266.D2/W1	Newport Friends of the Earth			10/07/2012	<input type="checkbox"/>	P	O		M	

Document: Deposit Plan, p.113

Policy: W1

Summary: Objection to Section 11.2 and its reference to strategy based on Prosiect Gwyrdd

<i>Item Question</i>	<i>Representation Text</i>	
2 2	Policy Number Section 11.2	
11 11	Site Name Llanwern	
14 14	Representation All references to a regional waste disposal or processing site at Llanwern should be removed. Any implication that the Plan will support the construction of a mass-burn incinerator. Any reference to a strategy based on Prosiect Gwyrdd's current shortlist. Incineration is not the Best Practicable Environmental Option (Section SP21).	
15 15	Do you want to speak at Public Examination?	Neither
<i>Item Question</i>	<i>Soundness Test</i>	
1 1	I think the LDP is sound.	No
<i>Item Question</i>		<i>Tick-box reply</i>
6 6	A new policy	Yes