

Newport City Council
Local Development Plan

Hearing Session 10: Environment and Heritage

10am – Thursday 1st May 2014



1. Protection of Natural Heritage.

I. **What evidence demonstrates that all development allocations in the Plan affecting SSSIs and other statutory natural heritage designations and protected habitat/species interests have been adequately assessed for their acceptability in principle in this respect?**

1.1 International and European Designations - The Habitats Regulations Assessment Screening Report (SD37) includes a detailed assessment on those policies and proposals that have the potential to affect the European sites within the Newport boundary (including the River Usk SAC and the Severn Estuary SAC, SPA and Ramsar site) and those within 15 km (including the Cardiff Beechwoods SAC, River Wye SAC, Wye Valley Woodland SAC, Wye Valley and Forest of Dean Bat SAC and Aberbargoed Grasslands SAC).

1.2 National Designations – There are currently four allocations in the plan which potentially impact upon national environmental designations. These are listed below:

The SA/SEA (SD34) recommends (paragraph 14.12) that 4 sites allocated in the Revised Deposit Plan (SD3) should be revised to exclude allocations within SSSIs.

- SP16(iii) - Duffryn Link Road: The Council's consideration of this proposal is set out in the Alternative Sites Assessment Report (SD31) site reference - RAS(D)001 and the Report of Representations on the Revised Deposit Plan (SD27: pages 327 – 339). The road is considered to be an essential infrastructure improvement to help address congestion at Junction 28, assist with delivery of the Duffryn EM1(i) employment allocation, and to serve the proposed Coedkernew railway station. Mitigation and where necessary, compensatory environmental measures can be secured via the planning process.
- T1(c) - Coedkernew railway station: The Council's consideration of the station's deletion is set out in the Alternative Sites Assessment at Revised Deposit Stage (SD31: site reference RAS(D)002) and the Report of Representations on the Revised Deposit Plan (SD27: pages 673 – 687). The station is proposed as part of the Regional Transport Plan and is considered to be an essential infrastructure improvement for the western area of Newport and would promote sustainable travel patterns and ease traffic congestion. Although the station would be located within the SSSI, its footprint would be relatively small and, by definition, it cannot be located away from the railway line. Mitigation and where necessary, compensatory environmental measures can be secured via the planning process. A set of Focussed Changes have been published during February 2014. As part of this, the location of the proposed station at Coedkernew has moved southwards, but the site remains in the SSSI. An update of the SA/SEA to reflect this Focussed Change is currently being prepared.
- EM1(i)- Duffryn – The Focussed Changes (February 2014) propose a reduction in size of the employment allocation, removing the majority of the site from the SSSI area. The SA/SEA is currently being reassessed on this basis. Approximately 0.8 ha of SSSI remains within the application.
- CF13(vii)-The school site at South of Percoed Lane, Duffryn: The Council has changed its view on this allocation. Confirmation has been received from the Council's Education Service that the school site is no longer required. Considering the environmental constraints associated with the site, it is proposed that this allocation is removed from the Plan.

1.3 Local Designations – There are five development Plan allocations that have the potential to affect a Site of Importance for Nature Conservation (SINC), these are detailed below. Full detail of the SINC's can be found in Submission Document 78.

LDP Allocation	SINC	NCC Comment
EM1(i) Duffryn	MF6 Pond/Phragmites reed bed, Cettis Warbler MF7 Neutral Grassland	The proposed development will be guided by a masterplan which will take into account ecological issues. There are no plans to build on the pond area.
EM1(iii) Celtic Springs	MF9 Post Industrial mosaic habitat. Neutral Grasslands. Calcareous Grasslands.	The proposed development will need to mitigate or compensate for the impact on the grasslands
H55 Woodlands Site	LL1 Ancient Semi-Natural Woodland LL2 Ancient Semi-Natural Woodland LL3 Ancient Semi-Natural Woodland LL16 Calcareous Grasslands	The proposed development will avoid the woodlands and would need to mitigate or compensate for the impact on the grasslands
H3 Llanwern Village	LL1 Ancient Semi-Natural Woodland LL2 Ancient Semi-Natural Woodland LL3 Ancient Semi-Natural Woodland LL16 Calcareous Grasslands	The proposed development will avoid the woodlands and would need to mitigate or compensate for the impact on the grasslands
CF9 Celtic Manor	CF8 Ancient Semi-Natural Woodland CF9 Ancient Semi-Natural Woodland CF10 Ancient Semi-Natural Woodland CF13 Ancient Semi-Natural Woodland CF14 Ancient Semi-Natural Woodland	Any proposed development will be guided by a masterplan which will take into account ecological issues. There are no plans to build on the woodland areas.

The table illustrates that majority of the SINC's are either woodlands or ponds and no development is planned in those areas. There are two areas of grasslands which are being/ have been considered as part of a planning application process. Mitigation and/or compensation will be sought in those areas. The Plan preparation process was undertaken in close correspondence with the Council's Green Services team. The policy framework in the Plan is considered robust and appropriate to maintain those ecological habitats and species at the Local level.

II. Have the allocations raising natural heritage issues identified by NRW in its consultation response dated 26 July 2013 (and also by others) been the subject of further joint

discussion - what is the present position concerning these sites? In particular, are changes needed to make the Plan sound as regards:

- a) SP16(iii) southern distributor road western extension (Gwent Levels - St Brides SSSI/Percoed Reen);**

1.4 The current NRW position on the site is as follows:

As advised in our comments on the Deposit and Revised Deposit LDP, the allocation is located within, and has the potential to have significant adverse effects on, the features for which the Gwent Levels - St Brides SSSI has been notified.

Given NCC's duty under the Wildlife and Countryside Act 1981(as amended) to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest, the area allocated for the road in SP16(iii) should be amended to exclude all areas of SSSI. This would also ensure that the allocation is consistent with, and represents a coherent flow from, the Revised Deposit Plan's objective to protect and enhance protected habitats.

Should it be decided to retain the boundary of the safeguarded area set out in Focused Change 1, the Plan should be amended to include a clear statement requiring development to minimise adverse impacts on:

- the SSSI, and the*
- adjacent Gwent Levels Landscape of Outstanding Historic Interest in Wales (LOHIW).*

To achieve this, Chapter 13 of the Revised Deposit LDP could be amended to include an annex that lists the sites that are allocated in the Plan, which identifies the key issues and constraints associated with each allocation that will need to be considered and addressed by potential developers. The relevant text relating to SP16(iii) should specify that any development at the site will be required to minimise adverse impacts on the SSSI and Gwent Levels LOHIW. The inclusion of such text will ensure that potential developers at the site are aware of the importance of the site and the key considerations associated with protecting its interests at the earliest opportunity.

The recently adopted Bridgend and Torfaen LDPs have followed a similar approach to clearly identify constraints and opportunities that will need to be taken into consideration when developing allocated sites, and have included a similar annex in their respective Plans.

1.5 Council Response: Following discussion at session 6 (infrastructure) it may be appropriate to create a protected corridor as opposed to an allocation. Should a proposal come forward then it is considered that Policy GP5 would adequately deal with the environmental impacts of the proposal. In relation to the proposal to include an additional section in the Plan which outlines particular constraints; that level of detail is most appropriately dealt with at the planning application stage and it is not considered necessary to add this text to make the Plan sound.

- b) H1(47) Glan Llyn (potential impacts on adjacent SSSIs);**

1.6 The current NRW position on the site is as follows:

Development at this site has the potential to cause changes to the hydrological regime at this location, which is likely to have a significant adverse effect on the features for which the Gwent Levels- Nash and Goldcliff, Whitson, and Redwick and Llandevenny SSSIs have been notified.

We note the protection afforded to SSSIs under Revised Deposit Plan Policy G5, and the need to read the Plan as a whole. However, as outlined above, NCC has a duty, under the Wildlife and Countryside Act 1981 (as amended), to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest. The Plan should therefore clearly identify that any development at this allocation will be required to demonstrate that it will avoid adverse impacts on the adjacent SSSI.

The site currently operates a closed system with a dedicated outfall system into the Severn Estuary, to manage any potential water contamination from the site. This avoids the potential discharge of contamination into the Gwent Levels- Nash & Goldcliff SSSI and potentially other Gwent Levels SSSIs on the Caldicot Level. This provision should be retained as part of any new development at the site.

As identified above in relation to our comments for the southern distributor road western extension, Chapter 13 of the Revised Deposit LDP could be amended to include an annex that lists the sites that are allocated in the Plan, which identifies the key issues and constraints associated with each allocation that will need to be considered and addressed by potential developers. The annex should specify that any development at the site should seek to retain the current outfall system, as part of any wider measures required to avoid adverse impacts on the Gwent Levels SSSIs.

An annex detailing the individual features that will need to be addressed will ensure that potential developers at the site are aware of the key considerations associated with the site at the earliest opportunity. Such an approach has been applied in the adopted Bridgend LDP, and Torfaen LDP.

- 1.7 Council Response: The site already benefits from outline planning permission, which includes conditions relating to environmental impact mitigation measures. Detailed planning permissions are in place for some 350 dwellings and construction is well advanced. When additional reserved matters are submitted on the later phases of the development then it is considered that Policy GP5 will adequately deal with the environmental impacts of the proposal. In relation to the proposal to include an additional section in the Plan which outlines particular constraints; that level of detail is most appropriately dealt with at the planning application stage and it is not considered necessary to add this text to make the Plan sound.

c) EM1(i) Duffryn (Gwent Levels - St Brides SSSI);

- 1.8 The current NRW position on the site is as follows:

We welcome the proposal under Focused Change 1 to further reduce the area of land allocated for employment under Policy EM1(i). However, an area of the SSSI remains within the employment allocation. Development on the SSSI will lead to the direct loss of an area of the SSSI, and has the potential to have an adverse effect on the on a wider area the SSSI, including an adverse effect on the features for which the SSSI has been notified.

Given NCC's duty under the Wildlife and Countryside Act 1981(as amended) to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest, the area allocated for employment purposes under EM1(i) should be amended to exclude all areas of the SSSI.

However, should it be decided to retain the boundary of the employment allocation as set out in Focused Change 1, the supporting text of the Plan should be amended include a clear statement that development within the allocation will be limited to the area of the site outside of the SSSI boundary. The Plan should also specify that development at this allocation will be required to avoid adverse impacts on the adjacent SSSI.

This would ensure that the allocation is consistent with the Council's duty under the Wildlife and Countryside Act and represent a coherent flow within the Plan from, the Revised Deposit Plan's objective to protect and enhance protected habitats.

- 1.9 Council Response: The supporting text of EM1 (i) makes reference to Policy GP5, it is not considered appropriate to make reference in the supporting text to where within the allocation development can and cannot be located. A detailed planning application is considered the most appropriate place for this level of detail and it is not considered necessary to add this text to make the Plan sound.

d) EM1(ii) East of Queensway Meadows (potential impacts on adjacent SSSIs);

- 1.10 The current NRW position on the site is as follows:

Again, as we have previously advised, development at this site has the potential to cause indirect loss and damage to SSSI features over a wide area of the Gwent Levels SSSI. Development which would cause changes to the current hydrological regime at this location, or cause pollution entering the SSSI has the potential to have a significant adverse impact on the features for which Gwent Levels - Nash and Goldcliff SSSI and the Gwent Levels – Whitson SSSI have been notified.

We note the protection afforded to SSSIs under Revised Deposit Plan Policy G5, and the need to read the Plan as a whole. However, given NCC's duty, under the Wildlife and Countryside Act 1981(as amended), to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest, the Plan should specify the requirement for any development at this allocation to avoid adverse impacts on these SSSIs.

As referred to above, we recommend that an annex is added to the Plan identifying the key issues and constraints associated with each allocation that need to be taken into consideration when developing the site.

For EM1(ii) the annex should specify that any development at the site would need to avoid adverse impacts on the Gwent Levels SSSIs. This will ensure that potential developers at the site are aware of the key considerations associated with the site at the earliest opportunity.

- 1.11 Council Response: All areas of the SSSI have been removed from the allocation. Impacts upon the adjacent SSSI would be adequately covered by Policy GP5.

e) EM1(iv) Solutia (potential impacts on adjacent SSSIs);

1.12 The current NRW position on the site is as follows:

As previously advised development at this site has the potential to cause changes to the hydrological regime at this location, which is likely to have a significant adverse effect on the features for which the adjacent Gwent Levels - Nash and Goldcliff SSSI has been notified.

We note the protection afforded to SSSIs under Revised Deposit Plan Policy G5, and the need to read the Plan as a whole. However, given NCC's duty, under the Wildlife and Countryside Act 1981(as amended), to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest, the Plan should specify the need for any development at this allocation to avoid adverse impacts on the adjacent SSSI.

Again, this is something that could be addressed in an annex to the Plan that identifies the key issues and constraints associated with each allocation that need to be taken into consideration developing the site.

For EM1(iv) the annex should specify that any development at the site would need to avoid adverse impacts on the SSSI. This will ensure that potential developers at the site are aware of the key considerations associated with the site at the earliest opportunity.

1.13 Council Response: All areas of the SSSI have been removed from the allocation. Impacts upon the adjacent SSSI would be adequately covered by Policy GP5.

f) EM1 (v) Gwent Europark;

1.14 NRW have no comment on this site.

g) EM2(ii) Llanwern former tipping area, south of Queensway (potential impacts on adjacent SSSIs);

1.15 The current NRW position on the site is as follows:

Development at this site has the potential to have a significant adverse effect on the features for which the Gwent Levels- Nash and Goldcliff SSSI, and Gwent Levels – Whitson SSSI have been notified.

We note the protection afforded to SSSIs under Revised Deposit Plan Policy G5, and the need to read the Plan as a whole. However, given NCC's duty under the Wildlife and Countryside Act 1981(as amended), to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest, the Plan should specify the need for any development at this allocation to avoid adverse impacts on the adjacent SSSIs.

The site currently operates a closed system with a dedicated outfall system into the Severn Estuary, to manage any potential water contamination from the site. This avoids the potential discharge of contaminated into the Gwent Levels SSSIs. This provision should be retained as part of any new development at the site.

The environmental issues associated with the allocation could again be identified in an annex to the Plan. For EM2(ii) the relevant text should specify that any development at the site should retain the current outfall system at the site, as part of wider measures that will be required to avoid adverse impacts on the SSSIs.

- 1.16 Council Response: All areas of the SSSI have been removed from the allocation. Impacts upon the adjacent SSSI would be adequately covered by Policy GP5.

h) T1 proposed rail station at Coedkernew (Gwent Levels - St Brides SSSI);

- 1.17 The current NRW position on the site is as follows:

We note that Focused Change 8 proposes to replace allocation T1 of the Revised Deposit Plan Policy with an 'Area of Search' for the location of the new Coedkernew station. The 'Area of Search' proposed is located within the Gwent Levels – St Brides SSSI. Development within this area 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.

Although a railway station at Coedkernew is proposed in the Regional Transport Plan (RTP), the RTP does not specify the location for the proposed scheme. Further, the appraisal document of the RTP recognises that the development of the station is reliant on associated development to provide sufficient catchment, and on the Newport Area resignalling project.

Given NCC's duty under the Wildlife and Countryside Act 1981(as amended) to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest, the Revised Deposit Plan's objective to protect and enhance protected habitats, and the relocation of the 'area of search' further away from the catchment area it is intended to serve, the 'Area of Search' currently identified in Focused Change 8 should be amended to a more appropriate location. Alternative locations should be considered, which are outside of the SSSI, and in closer proximity to existing or planned built development, to capitalise on sufficient catchment to justify the scheme and to deliver a scheme delivers the concept of sustainable development.

- 1.18 Council Response: The site was proposed as part of the Regional Transport Plan to serve east Newport and the Coedkernew Industrial/Business area. Section 7.9 of Policy T1 outlines the steps to be taken to mitigate the impact upon Percoed Reen. Furthermore Policy GP5 Section 3.23 states that developers must demonstrate the case for development, and that any development will be closely scrutinised for any direct or indirect effects on SSSIs. The Coedkernew station allocation should therefore remain in the LDP and Policy GP5 ensures that any proposals have to demonstrate how they avoid and mitigate negative impacts on areas of nature conservation.

- 1.19 In relation to appropriateness of the location, the station would be in close proximity to an existing employment area, and an area which is allocated for future employment use. There is no scope to relocate the station to remove it from the SSSI because, by definition, it must be located on the existing railway line, the position of which is fixed. The Council considers that the limited impact of the proposed station would be outweighed by the benefits of enabling increased sustainable transportation as an alternative to car use.

i) CF13(v) Duffryn High (potential impacts on adjacent SSSI);

1.20 The current NRW position on the site is as follows:

As previously advised, development at this site has the potential to cause changes to the hydrological regime at this location, which is likely to have a significant adverse effect on the features for which the adjacent Gwent Levels – St Brides SSSI has been notified.

We note the protection afforded to SSSIs under Revised Deposit Plan Policy G5, and the need to read the Plan as a whole. However, given NCC's duty, under the Wildlife and Countryside Act 1981(as amended), to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest, the Plan should specify the need for any development at this allocation to avoid adverse impacts on the adjacent SSSI.

An annex identifying the environmental issues associated with allocation CF13(v) should specify that any development at the site would need to avoid adverse impacts on the SSSI.

This will ensure that potential developers at the site are aware of environmental considerations associated with the site at the earliest opportunity.

1.21 Council Response: Following discussion at Session 6 (Infrastructure) it is proposed to remove the allocation.

j) CF13(vii) School south of Percoed Lane, Duffryn (Gwent Levels - St Brides SSSI);

1.22 The current NRW position on the site is as follows:

We understand that NCC intends to delete this allocation from the LDP. We welcome and support this amendment to the Plan.

k) SP16(ii) Queensway eastern extension

1.23 NRW has no comment.

III. Have all other matters concerning the natural environment raised by NRW been the subject of further consideration and dialogue - to what extent is there now an agreed way forward on these matters? What changes are needed to the Plan as a result?

1.24 The Council is not aware of any other matters and it is therefore considered that no further amendments to the Plan are required.

IV. Should natural heritage designations such as SSSIs and SINCs be marked on the Proposals Map?

1.25 No. These heritage designations are not LDP proposals, and therefore should not be shown on the LDP proposals map.

1.26 The Constraints Map shows the geographical location and extent of constraints to development that are created by legislation outside of the development plan process. Therefore it is considered the most appropriate place for natural heritage information

regarding international and national designations to be displayed. Showing these designations on the proposals plan would impact upon the clarity of the proposals plan. Showing the designations on a separate constraints plan allows individuals to see these natural heritage designations along with other considerations in order to allow all these matters to be considered in a comprehensive way.

- 1.27 The Sites of Importance for Nature Conservation background paper (SD78) identifies the location of SINCS. Due to the small scale of many of the sites and the regularity with which new sites can be added or removed it is considered inappropriate to show SINCS on the proposals map.

V. Are the provisions of policy GP5 sufficient to safeguard the natural heritage interest of sites which are also the subject of development allocations in the Plan? If not, what further safeguards are necessary?

- 1.28 Policy GP5 relates to the protection and enhancement of the natural environment. Natural Resources Wales (rep. 3683.L52) has confirmed that the policy is in accordance with test of soundness CE1.

- 1.29 GP5 is considered adequate in safeguarding the natural heritage of sites which are subject to development allocations in the Plan. The current position of Natural Resources Wales in relation to the individual sites which still contain environmental designations is set out in the response to question 1 (ii). Furthermore where there are still environmental designations within LDP allocations policy GP5 is a criteria based policy which requires applicants to demonstrate how proposals avoid, or mitigate and compensate negative impacts on areas of nature conservation.

- 1.30 The Council therefore considers that no further safeguards are necessary to make the Plan sound or to achieve the outcomes sought by NRW.

2. Allocations and Flood Risk.

I. **What evidence demonstrates that all development allocations in the Plan (including those with extant planning permissions) have been fully assessed against the requirements of TAN 15 Development and Flood Risk, taking account of current Development Advice Maps?**

- 2.1 Over 80% of the housing allocations within the Local Development Plan are housing commitments. These allocations reflect the planning approval for residential development at the site. As part of those approvals the relevant assessments, including the relevant flood consequence assessments, were undertaken to satisfy both the Local Planning Authority and NRW. As discussed in Hearing Sessions 2 & 3 these planning permissions are expected to be delivered within the Plan period and in line with the levels of flood mitigation as agreed at the planning application stage. The Council considers that the progression of these sites in line with an agreed level of flood mitigation means that it would be both inappropriate and meaningless to remove these allocations from the Plan.
- 2.2 Appendix I of the Flood Risk and Development Background Paper (SD86) sets out the justification of LDP allocations against Technical Advice Note (TAN) 15 tests. Appendix II of SD86 sets out the Strategic Flood Consequence Assessment (SFCA) which was a broad level assessment of the consequence of flooding for those allocations within the LDP, as requested by TAN 15.
- 2.3 The Development Advice Maps (DAM) set out by Welsh Government in TAN 15 were updated in April 2013. Appendix A of this paper sets out the LDP allocations for all residential developments, employment, transport and waste allocations and notes the current flood risk area for each site and how this information impacts its allocation within the Plan.
- 2.4 On review of the update to the DAM in 2013 there is one site that has moved from C1 into zone C2 that is currently under consideration by the Council because the planning permission for the site has lapsed. There is a flood risk assessment being undertaken for this site, taking into account the change into Zone C2 and revised lifetime of development to 100years. The remaining sites are considered to have been justified against a site specific FCA at the time of their approvals, as set out in Appendix A, or it is considered that the consequences of flood risk can be managed and mitigated against. All allocations in the plan without planning permission or where planning permission has lapsed will be required to satisfy the relevant flood assessment processes.

II. **What evidence demonstrates that, where a development allocation in the Plan involves land within zone C (either C1 or C2), all of the requirements of sections 6 and 7 of TAN 15 are satisfied in relation to each such allocation for the lifetime of the development?**

- 2.5 The LDP Flood Risk Assessments have been undertaken to ensure that the lifetime of development is taken into account. Reference to lifetime of development is made through the SFCAs (in SD86) and clarity has been set out in Table 2.1 (page 3) of the Stage 3 SFCA which notes that the lifetime of development as being 100years for residential development and 75 years for other development. In the case of housing commitments, these assessments were undertaken as part of the planning permission process.

III. What evidence demonstrates that surface water flood risk issues have been properly considered in relation to all development allocations in the Plan?

2.6 Section 7, Assessing Flood Consequence, of TAN 15 outlines the need for flood consequences to be assessed against various forms of flooding including surface water. Sections 4.6 and 5.4 of the Stage 1 SFCA (in SD86) outlines how surface water flood risk has been taken into account when assessing those LDP allocations at flood risk. The SFCAs utilised data from Natural Resources Wales of both Areas Susceptible to Surface Water Flooding (ASTSWF) and Flood Maps for Surface water Flooding (FMfSWF) to undertake the assessment. In the case of housing commitments, these assessments were undertaken as part of the planning permission process.

IV. What evidence demonstrates that NRW is now content that all of the allocations in the Plan are sound in respect of flood risk matters? Have the allocations identified by NRW in its consultation response dated 26 July 2013 been the subject of further joint discussion - what is the up to date position concerning these sites?

2.7 The NRW response letter dated the 26 July 2013 denotes twenty sites with which they have concerns. Each of these sites is discussed in the table below:

Site Name	NRW Concern	NCC Response
CF13(vii) Pencarn Lane School	Impact on SSSI	The Site has been deleted from the LDP.
EM1 (i) Duffryn	Impact on SSSI	No flood concerns raised.
EM1 (ii) East of Queensway Meadows	Impact on SSSI	No flood concerns raised.
EM2 (vii) Crindau	Flood Risk to proposed residential use	Following Hearing Session 7 on Employment the site is to be removed from the Plan. Any development proposed in the area will be judged against the LDP policies. This site was allocated as a regeneration EM2 site, not a housing allocation.
H50 Herbert Road & Enterprise House	Impact of Flood Risk	This site was part of the SFCA process. The Stage 3 SFCA concluded that significant mitigation is required (>1.0m) and escape routes exceed tolerable limits. However, para 4.4.11 of Stage 3 SFCA notes that with adequate warning the evacuation route is achievable. It is therefore considered that with mitigation and confirmation that the flood

		warning direct service is available the sites would be developable (provided that appropriate mitigation is undertaken).
H35 East Usk Yard	Impact of Flood Risk	This site was part of the SFCA process. The Stage 3 SFCA concluded that moderate mitigation is required ground raising (>0.6m) and escape routes are within tolerable limits.
H55 Woodlands Site	Impact on Natural Environment	No flood concerns raised, and site is not within a flood risk area.
H32 Former Sainsburys	Impact of Flood Risk	The site is subject to a Section 106 agreement, and this application process was able to satisfy the flood risk at the site. Due to the sites status as being subject to a section 106 agreement, NCC undertook a SFCA (March 2014) to ensure that it was able to manage the consequence of flood risk over the lifetime of the development (100years). The assessment is attached as Appendix B of this paper ¹ . The assessment concludes that there is a need for significant mitigation on the site required (>1.0m) and escape routes exceed tolerable limits. However, paragraph 4.3.32 of the SFCA notes the need for a site specific FCA, and various mitigation measures including layout and design of the site are detailed to ensure flood management over the lifetime of the development, the use of SuDS, land raising, a review of minimum ground and finished floor levels provided within the existing FCA and a site evacuation and escape plan.
H15 Old Town Dock Remainder	Impact of Flood Risk	The site is in Zone B.
H31 Roman Lodge Hotel	Impact of Flood Risk	The site is not in flood risk

¹ The SFCA update (March 2014) has been submitted to NRW for comment, which has not yet been received by NCC.

Housing commitments: H1 Adj McReadys H4 Pirelli H5 Glebelands H6 254 Cromwell Road H9 Frobisher Road H16 Penmaen Wharf H18 Newport Athletic Club H21 Former Floors 2 Go H27 21 Kelvedon Street H34 Bankside Coverack Road	Impact of Flood Risk	See Councils response in paragraph 2.1.
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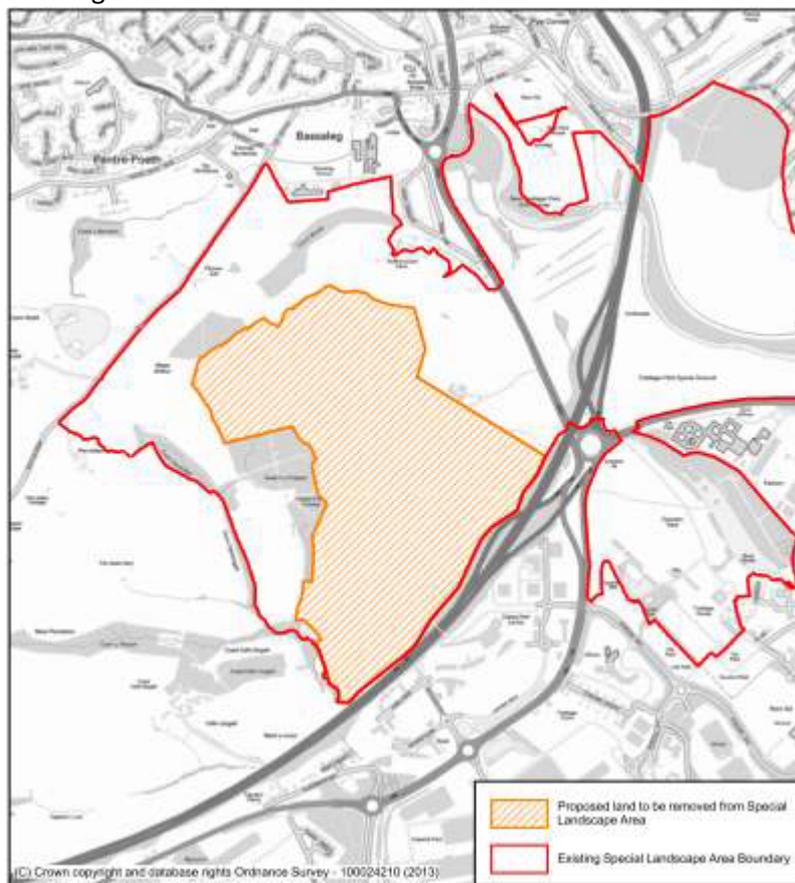
2.8 The Council considers that it has undertaken a broad level assessment that is required by National Planning Policy. The sixteen sites identified by NRW as being of concern due to their location in a flood risk zone have been assessed and justified so that they remain within the Plan. A site specific Flood Consequence Assessment and relevant mitigation will be required at the planning application stage for those sites remaining in flood risk areas.

Afternoon (2.00pm onwards)

3. Policy SP8 Special Landscape Areas.

- I. Is proposed SLA designation SP8(vii) Tredegar Park sound (ie coherent and consistent) as regards the inclusion of the Graig y Saeson section of the designation, in the light of the character of the land and existing permissions for development?**

Drawing 1



- 3.1 The plan above shows the area of land known as Graig y Saeson (hatched orange). A request that the area of land be removed from the SLA designation was received at the revised deposit stage and was consulted upon at the Alternative Sites stage.
- 3.2 The site is located within Special Landscape Area 7: Tredegar Park. The wider setting of the park, particularly the area north of the motorway, and its proximity to Bassaleg and Pentrepoeth, which are subject to constant development pressure. The primary landscape features of the area relate to the wider parkland and the historic hill fort at the Gaer. A disruptive element is introduced by the M4 motorway which effectively splits the parkland in half. The main tree avenue remains, and this provides the visual link across the motorway corridor. The formal parkland around the Tredegar House is currently managed as a County Park by the City Council and the National Trust and notwithstanding the intensive

development pressures remains a largely intact feature. The boundary of the SLA is justified on the grounds that it reflects that of the Cadw/ICOMOS designation. The broader contextual setting north of the M4 follows the urban edge and local road pattern.

- 3.3 The designation of the Tredegar Park SLA is consistent with the Countryside Council for Wales (now Natural Resources Wales) LANDMAP Information Guidance Note 1 set out in the Special Landscape Area Topic Paper (SD71). The area highlighted in Drawing 1 is identified as being of high/moderate quality with regards the geological aspect layer, high/moderate with regards to landscape habitat aspect layer, high/moderate with regards to visual and sensory aspect layer, high/moderate with regards to the historical aspect layer, and high/moderate with regards to the cultural aspect layer. Overall the designation of this section of the SLA is considered appropriate.
- 3.4 The planning history of the site shows that planning permission was granted for a hotel and golf course on appeal in the 1992. Further applications were submitted to extend the time period on the planning permission. Colleagues in the Planning Enforcement section who have investigated enforcement complaints on the site recently, have indicated that there was no evidence that the planning permission has been implemented. Two recent applications for a replacement dwelling (13/1180) and farm management building (14/0075) further indicates that there is no intention of implementing the earlier permission. A blue line plan submitted with planning application 14/0075 indicates that the area shown in drawing 1 falls entirely within the ownership of the applicant.

4. Policy SP6 Green Belt.

- I. **Is there a clear rationale and justification for the proposed extension proposed to the existing Green Belt? Is the proposed extension based on a formal assessment of the area's contribution to urban form and the location of new development? Is the resulting Green Belt designation consistent with PPW guidance concerning the purposes of Green Belts? Is it consistent with the Green Belt designation within the adjoining authority area of Cardiff?**

- 4.1 The rationale and justification for the extension in the Green Belt is due to continued pressure to develop the area. Pressure includes internal pressure from within the authority and outside. The Cardiff City Council Preferred Strategy has indicated a strategic housing (500+ units) and a strategic employment site in the north east of Cardiff's administrative area, near or adjacent the Newport green belt, adding additional development pressure to the area. The use of the M4 as a clearly identifiable feature on the northern boundary of the area of extended Green Belt is considered a more robust and logical boundary.
- 4.2 The extension to the Green Belt was recommended in the Preferred Strategy (SD40) based on the justification set out above, however a formal assessment was not conducted of the area to be included in the extension. The following justification was given in the Preferred Strategy (P. 8):
- 4.3 There are still coalescence pressures between Newport and Cardiff. No change is proposed to the current boundary of the Green Belt, other than to extend it northwards from Druidstone Road to the M4, a small area that was previously excluded. Planning Policy Wales states that "Clearly identifiable physical features should be used to establish defensible boundaries" (paragraph 4.8.12) and the motorway would provide a very strong boundary. Green Belts also have a role in protecting the setting of an urban area (paragraph 4.8.3). The

motorway is a key corridor through which the city is approached, so protecting land between it and development pressures spreading out from Cardiff is considered to be important.



Photo A: The view looking south west along Druidstone Road towards the boundary with Cardiff.



Photo B: The view looking north east from Tyla Lane at a point north of the A48(M).

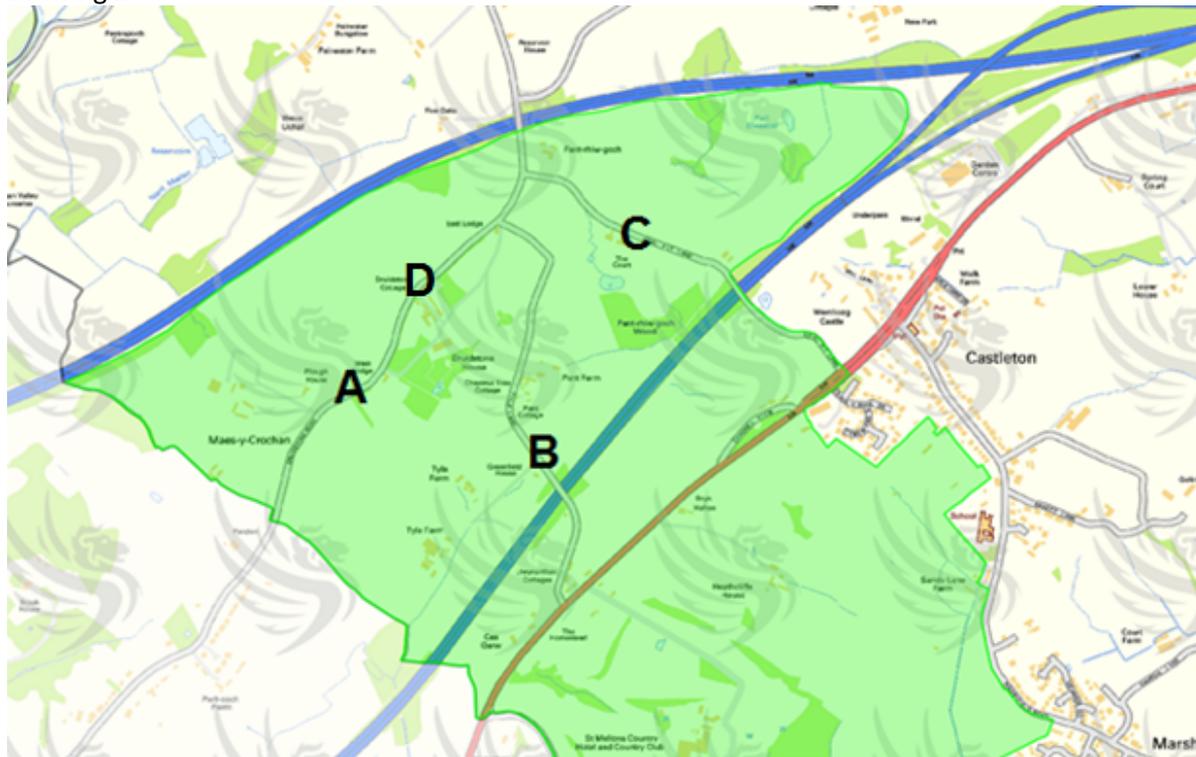


Photo C: Coal Pit Lane looking east.



Photo D: Looking north from Druidstone Road.

Drawing 2



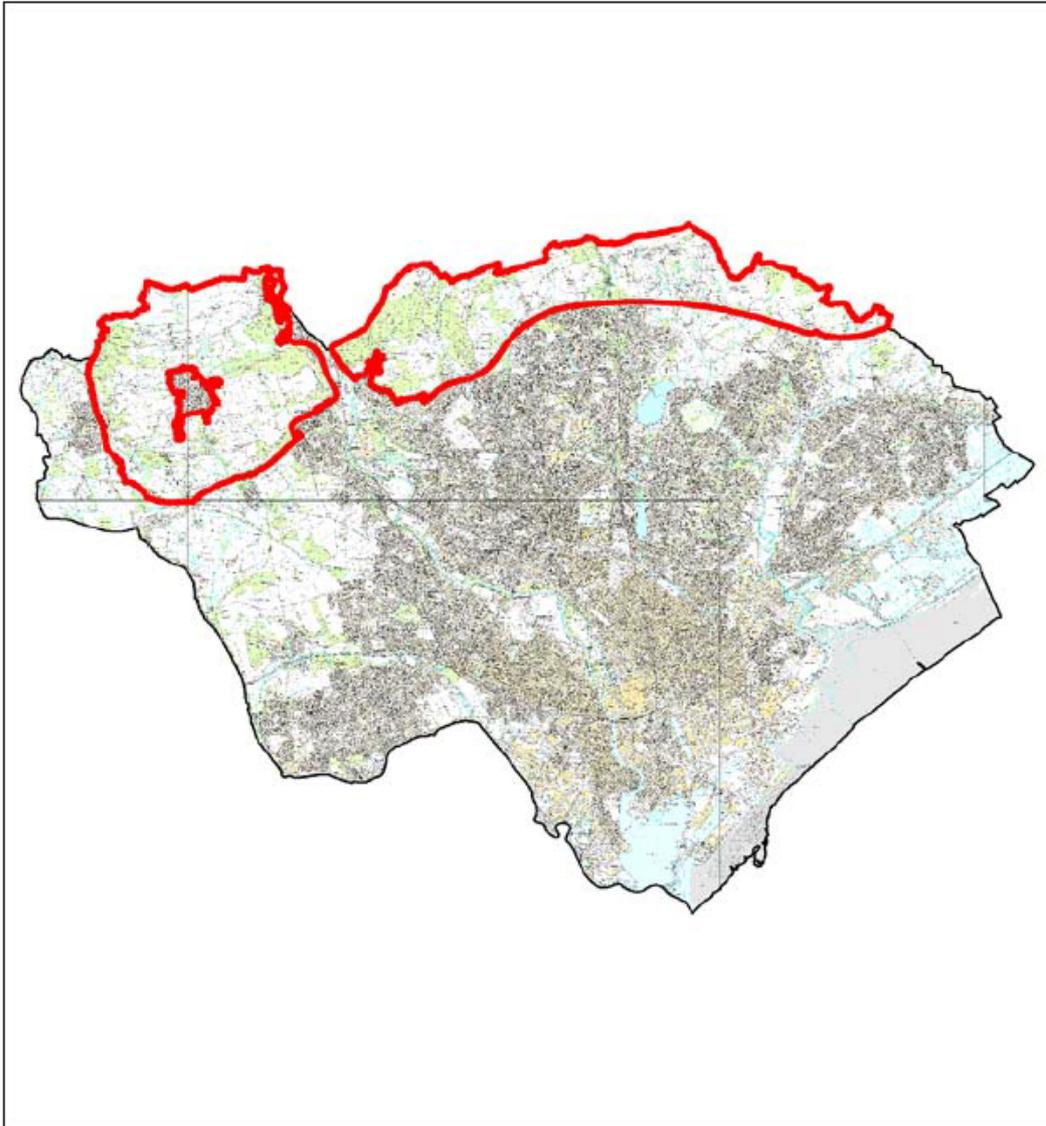
4.5 The photographs above illustrate (drawing 2 shows location of photographs) the open character of the area located between the M4 and the A48(M). The area of extended Green Belt, shown in photographs A and D, is very similar in landscape character to the area currently allocated in the Unitary Development Plan. The area is characterised by its openness; Planning Policy Wales states that the most important attributes of Green Belts are their permanence and their openness (paragraph 4.8.5). Therefore it is considered that inclusion of the area of extended Green Belt would be in keeping with the character of the existing Green Belt designation, and that the M4 is the logical northern boundary.

Planning Policy Wales states that the purpose of a Green Belt is to:

- Prevent the coalescence of large towns and cities with other settlements - The Green Belt allocation serves to prevent the coalescence of Newport and Cardiff taking into account the new development pressures in Cardiff in particular.
- Manage urban form through controlled expansion of urban areas - Serves to manage the urban form of Newport through creating a barrier which restricts the growth of Newport to the east thus ensuring it remains a distinct urban area separate from Cardiff to the west.
- Assist in safeguarding the countryside from encroachment - The additional protection afforded an area of Green belt will serve to avoid encroachment into this area of countryside ensuring its open character.
- Protect the setting of an urban area - The motorway is a key corridor through which the city is approached, so protecting land between it and development pressures spreading out from Cardiff is considered to be important.
- Assist in urban regeneration by encouraging the recycling of derelict and other urban land – The inclusion of Green Belt directs development away from this area to urban brownfield sites in accordance with the brown field led urban regeneration strategy of the plan. Sufficient land is allocated elsewhere in order to provide land for other land uses (housing, employment etc.).

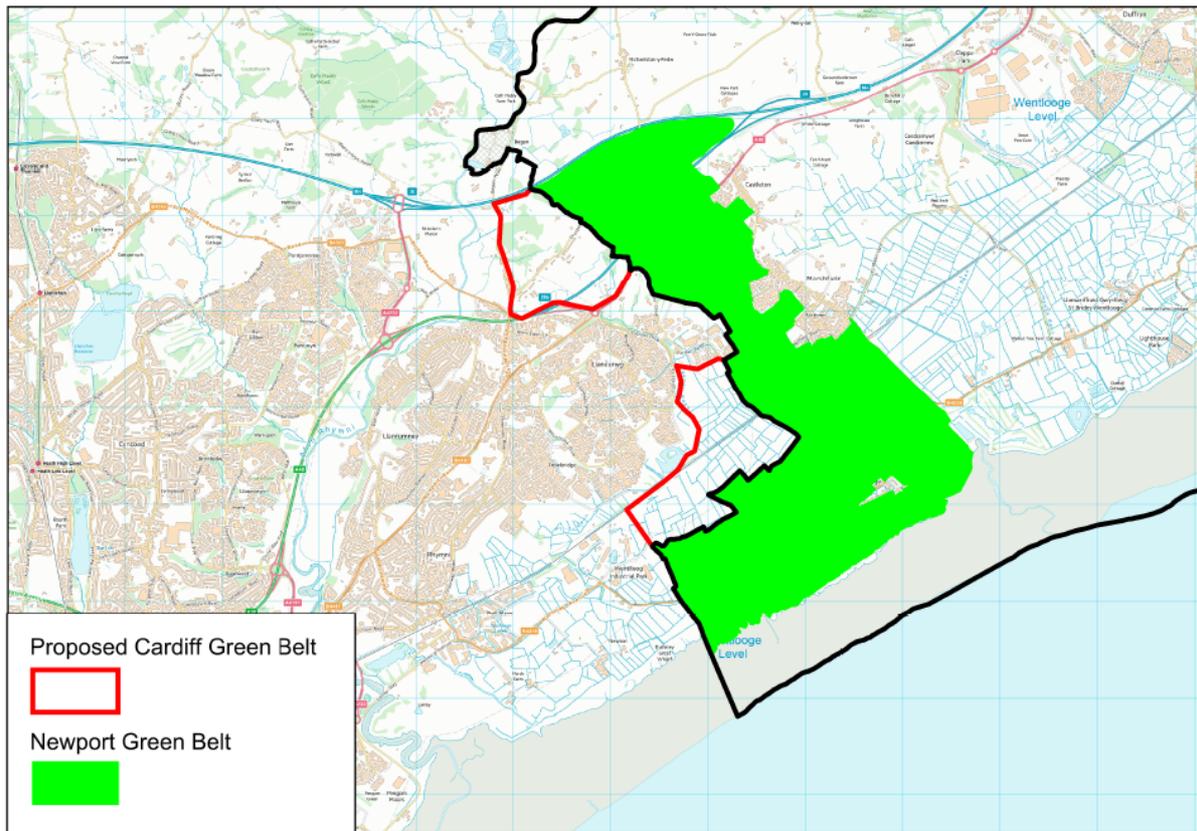
The following drawing shows the area of proposed Green Belt in the draft Cardiff LDP:

Drawing 3



- 4.6 The area of Green Belt proposed in the draft Cardiff LDP does not directly abut the Newport Green Belt. In its current form it sits entirely to the north of the M4. However a representation was made by Newport City Council during the consultation period of the Cardiff LDP requesting an extension to the Cardiff Green Belt. The drawing below shows the Newport Green Belt in context with the area of extended Cardiff Green Belt suggested by Newport City Council. The extensions were recommended to strengthen the purpose of the Newport Green Belt namely in order to avoid the coalescence of the two urban areas. This proposal was subject to recent consultation under Cardiff's Alternative Sites stage.

Drawing 4



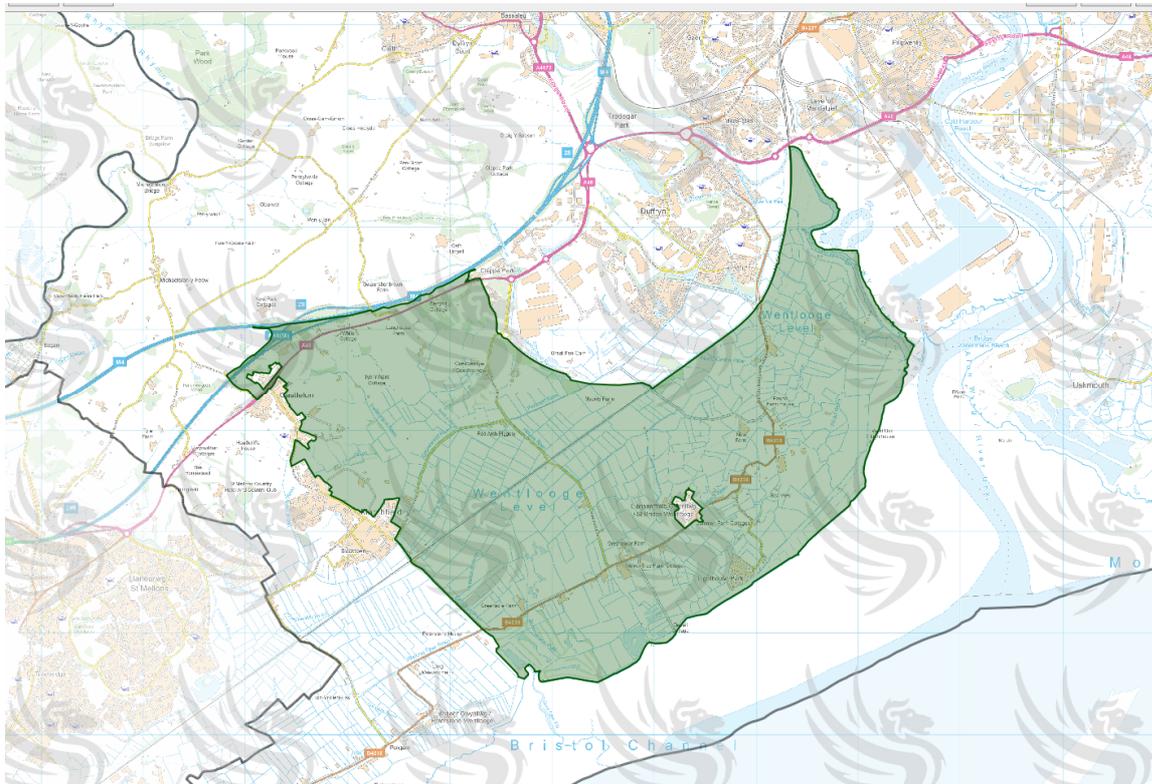
4.7 In light of the absence of an existing mechanism which allows the drawing up of Green Belts across local authority boundaries, the LPA has sought to strengthen the function of its Green Belt through requesting an extension to the Cardiff Green Belt. The narrowest part of the resultant Green Belt is regrettable but simply reflects the existing urban areas.

5. Policy SP7 Green Wedges.

- I. Are the green wedge designations in the Plan soundly based on a formal assessment of contribution to urban form and the location of new development? What evidence demonstrates that normal planning and development management policies cannot provide the necessary protection? Do the green wedges include only land that is strictly necessary to fulfil the purposes of the policy?

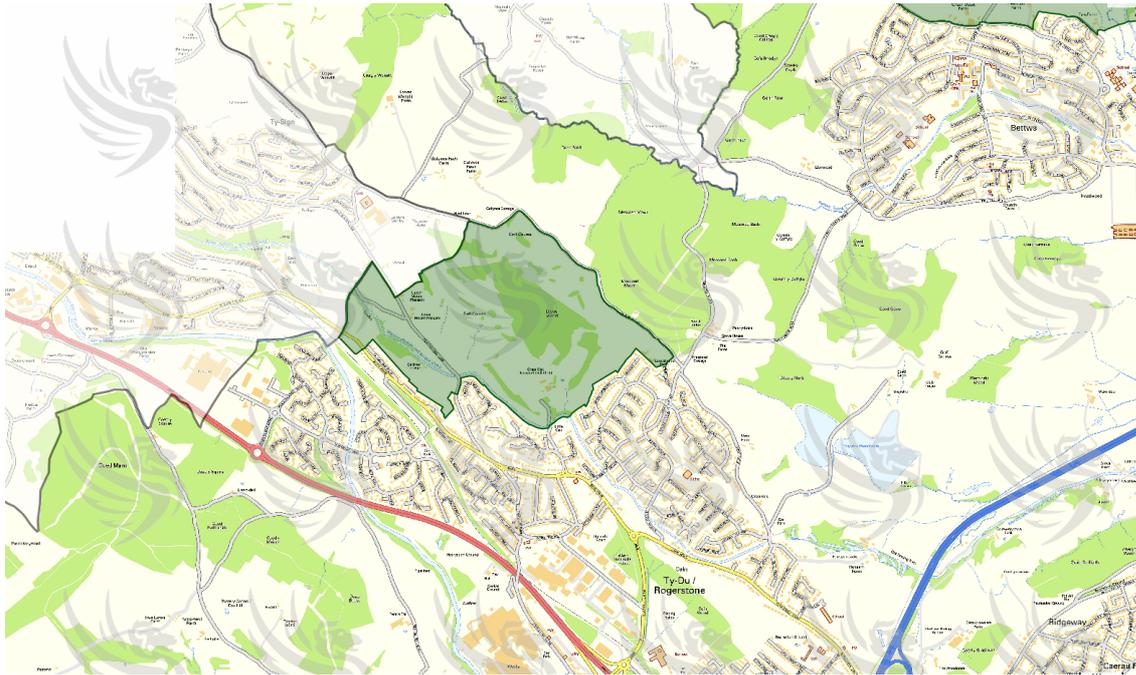
5.1 The green wedges proposed in the LDP were carried forward from the Unitary Development Plan. The rationale for each allocation is set out below. Experience has shown that the green wedge allocations in the existing UDP have been invaluable as a Development Management tool for resisting inappropriate and harmful development in these most sensitive areas, and the policies have been supported at appeals.

Newport and Cardiff



- 5.2 The area of green wedge is located to the east of the Green Belt allocation which sits between the boundary of Cardiff Council and Marshfield and Castleton. The green wedge allocation in this location is considered to complement the Green Belt. The allocation is within the Wentlooge Levels area which is characterised by a flat open landscape. The area, including the Green Belt to the west, serves to protect the open character of the area and avoid the coalescence of the distinct communities of Newport and Cardiff. The designation of the area as Green Wedge also serves to assist in safeguarding the countryside from encroachment.
- 5.3 It is considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). PPW states that there is a general presumption against development which is inappropriate (development considered appropriate is outlined in 4.8.16 of PPW) in relation to the purposes of the designation. Those forms of 'inappropriate development' may not be resisted if the area was subject to the general policies controlling development in the countryside.
- 5.4 It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of green wedge as identified in PPW i.e. the land between Castleton/ Marshfield and Duffryn and the southern section of the western levels which is largely undeveloped and has an open appearance.
- 5.5 The area is under development pressure as shown by the number of alternative sites put forward in the area designated as green wedge (see Revised Deposit LDP - Alternative Sites Register).

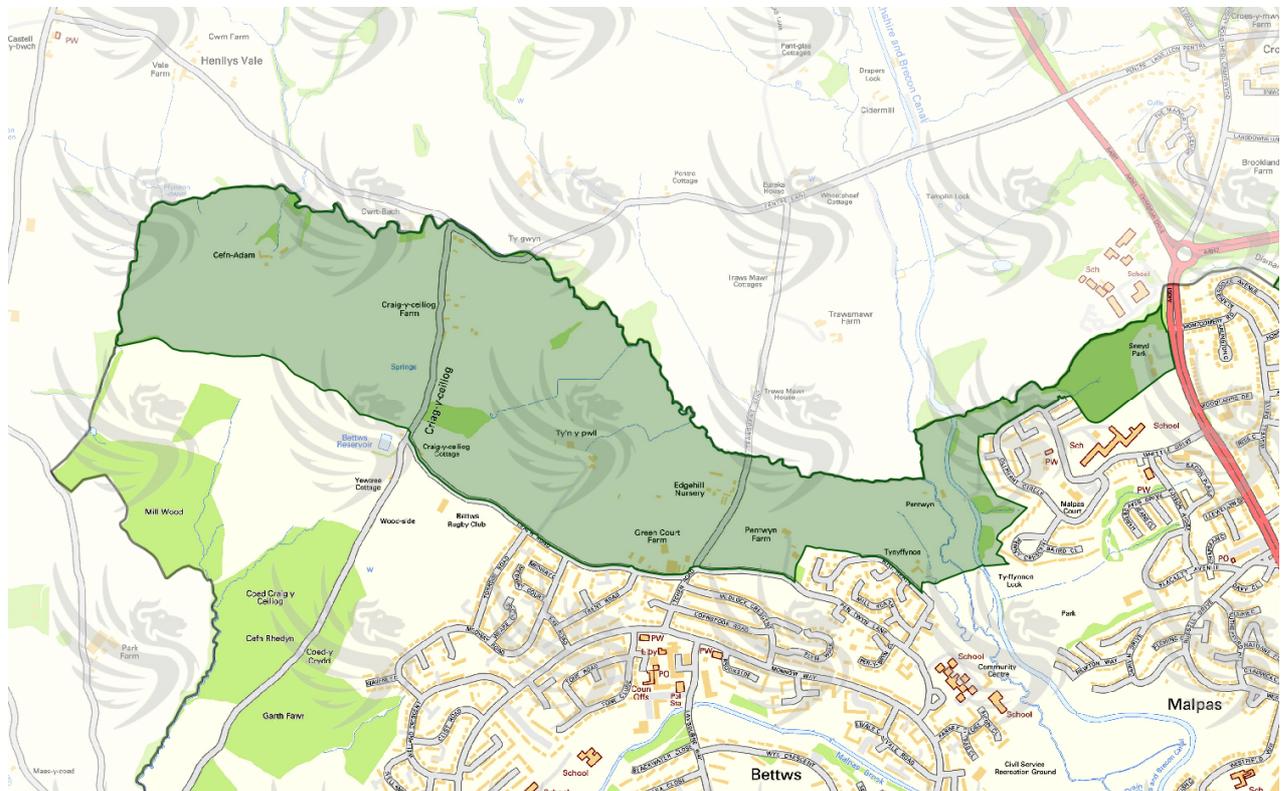
Rogerstone and Risca



- 5.6 The area of green wedge is located to the north of Rogerstone. The area is characterised by a mix of landscapes including woodland and a golf club, and is also crossed by the Monmouthshire Brecon Canal. The north western section of the green wedge sits adjacent a green wedge allocation in the Caerphilly Local Development Plan. The area of green wedge in combination with the corresponding allocation in the neighbouring authority serves to avoid the coalescence of Rogerstone and Risca.
- 5.7 Whilst the area of land would have a certain level of protection should it be allocated as Countryside it is considered that the additional green wedge allocation would serve to protect the area from further encroachment, and protect its openness in order to maintain a gap between the two settlements and maintain their separate identities.
- 5.8 It is considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). PPW states that there is a general presumption against development which is inappropriate (development considered appropriate is outlined in 4.8.16 of PPW) in relation to the purposes of the designation. Those forms of 'inappropriate development' may not be resisted if the area was subject to the general policies controlling development in the countryside.
- 5.9 It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of green wedge as identified in PPW i.e. the land which sits to the north of Rogerstone and the south east of Risca.
- 5.10 The area is under development pressure as shown by the number of alternative sites put forward in the area designated as green wedge (see Revised Deposit LDP - Alternative Sites Register).

- 5.11 The allocation is considered to accord with the purposes of a green wedge as set out in Planning Policy Wales, and its removal may serve to undermine the corresponding designation in the adopted Caerphilly Local Development Plan.

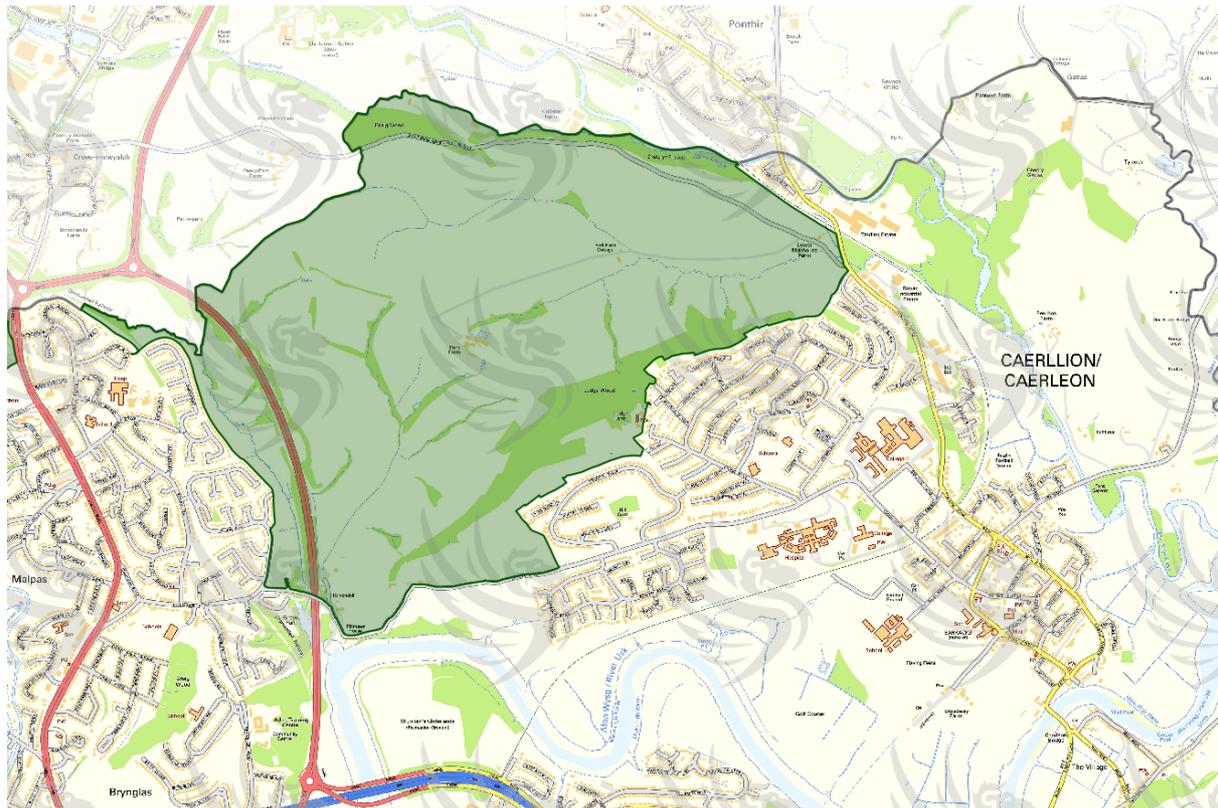
Bettws, Malpas and Cwmbran



- 5.12 The area of green wedge is located to the north of Bettws and Malpas on the boundary with Torfaen County Borough Council. The area is characterised by undulating hills and woodland. The green wedge allocation sits adjacent a green wedge allocation in the neighbouring authority. The combination of the allocations serves to avoid the coalescence between Malpas and Bettws and Cwmbran to the north.
- 5.13 Whilst the area of land would have a certain level of protection should it be allocated as Countryside it is considered that the additional green wedge allocation would serve to protect the area from further encroachment, and protect its openness in order to maintain a gap between the two settlements and maintain their separate identities.
- 5.14 It is considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). PPW states that there is a general presumption against development which is inappropriate (development considered appropriate is outlined in 4.8.16 of PPW) in relation to the purposes of the designation. Those forms of 'inappropriate development' may not be resisted if the area was subject to the general policies controlling development in the countryside.
- 5.15 It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of green wedge as identified in PPW i.e. the land between Malpas, Bettws and Cwmbran.

- 5.16 The area is under development pressure as shown by the number of alternative sites put forward in the area designated as green wedge (see Revised Deposit LDP - Alternative Sites Register).
- 5.17 The allocation is considered to accord with the purposes of a Green wedge as set out in Planning Policy Wales, and its removal may serve to undermine the corresponding designation in the adopted Torfaen Local Development Plan.

Caerleon and Cwmbran

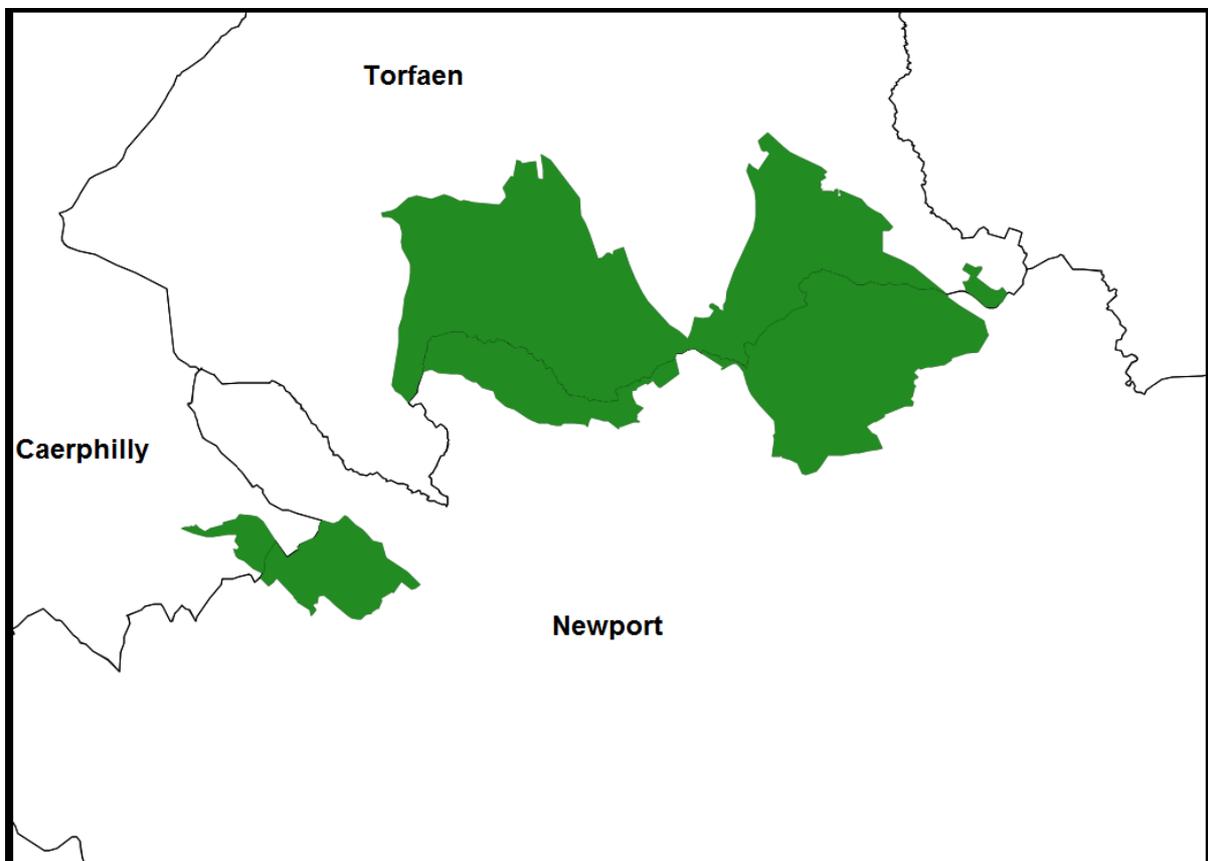


- 5.18 The area of green wedge is located to the east of Malpas and to the north of Caerleon. The area contains Lodge Wood located on the ridge above Caerleon. The land beyond the ridge is a mixture of woodland and open fields. The section directly to the west of Malpas includes the A4042. The allocation sits adjacent to a section of green wedge allocated by Torfaen County Borough Council. The combination of the allocations serves to avoid the coalescence of Malpas, Caerleon, and Cwmbran.
- 5.19 Whilst the area of land would have a certain level of protection should it be allocated as Countryside it is considered that the additional green wedge allocation would serve to protect the area from further encroachment and protect its openness in order to maintain a gap between the two settlements and maintain their separate identities.
- 5.20 It is considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). PPW states that there is a general presumption against development which is inappropriate (development considered appropriate is outlined in 4.8.16 of PPW) in relation to the purposes of the designation.

Those forms of 'inappropriate development' may not be resisted if the area was subject to the general policies controlling development in the countryside.

- 5.21 It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW i.e. the land between Malpas, Caerleon and Cwmbran.
- 5.22 The area is under development pressure as shown by the number of alternative sites put forward in the area designated as green wedge (see Revised Deposit LDP - Alternative Sites Register).
- 5.23 The allocation is considered to accord with the purposes of a green wedge as set out in Planning Policy Wales, and its removal may serve to undermine the corresponding designation in the adopted Torfaen Local Development Plan.

Drawing 5



The drawing above shows the allocated green wedges in Newport and their corresponding allocations in Torfaen and Caerphilly.

6. Policy CE1 Development in the Green Belt and Green Wedges.

- I. Is this policy intended to add to or modify national policy concerning development in Green Belts and green wedges in any way? If not, why is an LDP policy proposed concerning this?
- II. Are the detailed provisions of policy CE1 consistent with those in PPW? In particular, is the policy and supporting text coherent and consistent as regards:
 - i) reference in criterion i) to agricultural or forestry uses rather than justified rural enterprises;
 - ii) reference in criterion vi) to mineral working being permitted;
 - iii) reference to visual amenities not being harmed by development proposals outside the designated area;
 - iii) references in paragraph 4.1 to various types of development being considered “appropriate” and potential confusion with PPW definitions of inappropriate development;
 - iv) interpretation of 30% of original volume stipulation in paragraph 4.1 - and whether such a categorical proviso, if imposed, should be embodied within the policy wording?

6.1 On reflection, it is acknowledged that policy CE1 closely resembles national planning policy. It is therefore proposed that policy CE1 is removed from the Plan, however, the 30% volume stipulation is considered valuable. It is therefore proposed that policies SP6 (Green Belt) and SP7 (Green Wedges) are amended to include this stipulation. Proposed new wording is below:

SP6 Green Belt

THE GREEN BELT IS MAINTAINED ALONG THE NEWPORT – CARDIFF BOUNDARY AND EXTENDED NORTHWARDS TO THE M4 MOTORWAY. WITHIN THIS AREA DEVELOPMENT WHICH PREJUDICES THE OPEN NATURE OF THE LAND WILL NOT BE PERMITTED. AN INCREASE IN SIZE OF A DWELLING OF MORE THAN 30% OF THE VOLUME OF THE ORIGINAL SIZE OF THE DWELLING, OR AS EXISTED IN 1948, WILL NOT BE APPROVED.

SP7 Green Wedges

GREEN WEDGES HAVE BEEN IDENTIFIED IN ORDER TO PREVENT COALESCENCE BETWEEN THE FOLLOWING SETTLEMENTS:

- i) NEWPORT AND CARDIFF;
- ii) ROGERSTONE AND RISCA;
- iii) BETTWS, MALPAS AND CWMBRAN;
- iv) CAERLEON AND CWMBRAN.

WITHIN THESE AREAS DEVELOPMENT WHICH PREJUDICES THE OPEN NATURE OF THE LAND WILL NOT BE PERMITTED. AN INCREASE IN SIZE OF A DWELLING OF MORE THAN 30% OF THE VOLUME OF THE ORIGINAL SIZE OF THE DWELLING, OR AS EXISTED IN 1948, WILL NOT BE APPROVED.

7. Historic Environment - Policies CE5 - CE8.

- I. What is the purpose of the references to historic battlefields in policy CE5 and paragraph 4.23? Are any such sites present within the Plan area?
 - 7.1 Cadw consulted on the establishment of a Register of Historic Battlefields in Wales in March 2011. It is proposed that Cadw, the Welsh Government Historic Environment Service, compiles and maintains a non-statutory list of nationally important sites. The register will provide information to aid understanding, protection, sustainable management as well as being an interpretative, education and research resource.
 - 7.2 The definition of a battlefield in Wales will differ from that in Scotland and England, to reflect the smaller and less formal battles that have taken place. Therefore the proposal outlines a broadened definition to include battles, sieges, invasions, skirmishes, ambushes and massacres. This may include examples of social unrest, for example the Chartist march on Newport in 1839, which culminated in the incident at the Westgate Hotel. There are no current sites identified however reference to the register is considered appropriate.
- II. What does paragraph 4.25 (supporting text to policy CE6 Locally Listed Buildings and Sites) mean? Should this paragraph be re-worded and simplified, for clarity?
 - 7.3 The intention of the paragraph is to stress that the fact that a building or site which is locally listed is a material planning consideration when assessing planning applications. The concern regarding clarity is noted. It is recommended that the policy be re-worded as follows:

The locally listed status of a building or site should be a consideration at the planning application stage. Justification will be required for the loss or unsatisfactory alteration of such buildings or sites, and intervention will be sought to secure their conservation and enhancement.
- III. Why is requirement i) of policy CE8 Conservation Areas different to the statutory duty concerning conservation areas - is this intentional? Is the difference in wording likely to introduce uncertainty and confusion? Should the wording be amended?
 - 7.4 In order to bring the policy in line with Welsh Office Circular 61/96 (paragraph 19) it is recommended that the criterion be worded as follows:

PRESERVE OR ENHANCE ALL THE ASPECTS OF CHARACTER OR APPEARANCE THAT DEFINE AN AREA'S SPECIAL INTEREST, HAVING REGARD TO THE CONSERVATION AREA APPRAISAL WHERE APPROPRIATE.

Appendices

Appendix A: April 2013 DAM update for LDP Allocations and Commitments

Appendix B: Stage 3 SFCA update (March 2014)

Appendix A: April 2013 DAM update for LDP Allocations and Commitments

LDP Ref	Site Name	Total Capacity of the Site	DAM Flood Zone Post April 2013	Site Status/Notes
H1	Adj. McReadys Ponthir Road	54	C2	Planning permission has been implemented. NRW had no objection because the FCA illustrated how the risk and consequences of flooding could be effectively managed.
H4	Pirelli	250	C1	Planning Permission has been granted and a FCA undertaken. Implementation of planning permission expected this year
H5	Glebelands	153	C1	Planning Permission has been granted and a FCA undertaken
H9	Frobisher Road	10	C1	Planning Permission has been granted and a FCA undertaken
H12	Former Tredegar Park Golf Course	150	C2	Planning Permission has been granted (under appeal) and a FCA undertaken. The flood defence works have started to be implemented on Tredegar Park.
H15	Victoria Wharf – Penmaen Wharf	130	C1	Planning Permission has lapsed. SFCA undertaken to ensure the consequences of flooding can be managed. The updated SFCA (March 2014) concluded that significant mitigation is required (>1.0m) and escape routes exceed tolerable limits. The report notes that with adequate warning the evacuation route is achievable. Where land is allocated for development, an updated or new site-specific FCA will be required, building on the information in this report. This should incorporate additional information on mitigation of residual risk and emergency planning procedures to ensure escape / evacuation for the lifetime of the development.
H21	Former Floors 2 Go	10	C1	Planning Permission has been granted and a FCA undertaken
H23	Traston Lane	21	C1	Planning Permission has been granted and a FCA undertaken
H28	Church Street	16	C2	Planning Permission was granted and a FCA undertaken. However this permission has recently lapsed and the site has been

				redesignated as flood zone C2 in the latest DAM. The Council is considering a current application being considered for residential development at the site as the permission has lapsed. The Agent has confirmed that they need to evidence the suitability of an evacuation route to satisfy NRW that the development is acceptable.
H30	Rear of South Wales Argus	82	Part B	Planning Permission has been granted
H32	Former Sainsbury's	140	Part C1	Planning Permission has been granted and a FCA undertaken
H34	Bankside Coverack Road	38	C1	Planning Permission has been granted and a FCA undertaken
H35	East Usk Yard	100	Part C1	Stage 3 SFCA undertaken, mitigation measures would be required.
H50	Herbert Road	62	C1	Stage 3 SFCA undertaken, mitigation measures would be required.
H52	Old Town Dock Remainder	350	B	Planning Permission is being sought on the site, screening opinion for 350 units has been undertaken.
H54	Alcan	1064	C1& Part C2	Planning Permission has been granted and a FCA undertaken, developer on site preparing land for development. The C2 zone of the development is on the west of the site adjacent to the river. The development of the site is within zone C1.
H59	24 Crawford Street	10	C1	The site has planning permission, a FCA was undertaken and NRW had no objection subject to an agreed slab level.
H58	Panasonic	250	C1	The site has planning permission, a FCA was undertaken and NRW did not oppose the development subject to conditions.
H11	Laburnum Drive	20	-	Under Construction
H13	Alt Yr Yn	125	-	Under Construction
H17	Former Hurrans Garden Centre	60	-	Under Construction
H37	City Vizion	464	C1	Under Construction
H38	Lysaghts Village (Orb works)	517	C1	Under Construction
H39	Former Bettws Comprehensive	229	-	Under Construction
H40	Westmark, Old Town Dock	154	C1	Under Construction
H41	Trinity View	194	-	Under Construction
H42	Black Clawson	354	C2	Under Construction
H43	Portskewett Street	117	C1	Under Construction
H45	Lysaghts	176	C1	Under Construction
H47	Glan Llyn	4000	C1	Under Construction

H3	Llanwern Village	1100	-	The site is not at flood risk
H7	Bethesda Close	22	-	The site is not at flood risk
H8	Severn Stiles	23	-	The site is not at flood risk
H10	Pencoed Castle	12	-	The site is not at flood risk
H14	Monmouthshire Bank Sidings	575	B	Development has a small area in Zone B majority of site is not within a flood risk zone
H19	Hartridge High School	65	-	The site is not at flood risk
H24	30-33 High Street	24	B	The site is within the city centre, development above shops
H25	Taylor's Garage	71	-	The site is not in flood risk
H26	Ty Du Works	26	-	The site is not in flood risk
H31	Roman Lodge Hotel	10	-	The site is not in flood risk
H36	Farmwood Close	108	-	The site is not in flood risk
H51	Whitehead Works	400	Part B	The majority of the site is not in flood risk, with a small line of Zone B to the north of the site
H53	Bideford Road	35	Part B	The site is in Zone B
H55	Woodland Site	300	-	The site is not in flood risk
H56	Opposite Belmont Lodge	122	-	The site is not in flood risk
H57	Treberth Crescent	58	-	The site is not in flood risk
H60	Parry Drive	15	-	The site is not in flood risk

LDP Ref	Site Name	DAM Flood Zone Post April 2013	Site Status/Notes
EM1 (i)	Duffryn	Part C1	The employment uses on the site are considered to be low vulnerability, where the consequences of flooding can be managed and uses that are key to the implementation of the growth strategy of the LDP. It is considered that the social and economic impacts of the site, outweigh the environmental impact which can be adequately managed for the lifetime of the development
EM1 (ii)	East of Queensway Meadows	C1	
EM1 (iv)	Solutia	C1	
EM3	Newport Docks	B/C1/C2	The majority of the site is either out of flood risk or in Zone B. The remaining area is Zone C1 with a small portion at the entrance of the Dock in Zone C2. The Policy EM3 is set out to protect existing uses and any further applications will need to consider their impact on flood risk.
EM1(v)	Gwent Europark	C1	There is an extant planning permission on the site
EM2(i)	Glan Llyn	C1	There is an extant planning permission on the site which is under construction
EM2(iii)	Phoenix Park	C1	The majority of the site is within Zone C1. The site is brownfield; part of the employment land supply and the Stage 2 SFCA noted that development is sequentially located in areas of lower risk and a site specific FCA is required. It is worth noting that the site is proposed for less vulnerable uses.

EM2(vi)	Godfrey Road	None	N/A
Em2(ix)	Cardiff Road (Mon Bank)	B	There is an extant planning permission on the site, which has been implemented.
CF13 (i)	Whitehead Works	Small area of B	N/A
CF13 (ii)	Novelis	C1/ Part C2	The site is adjacent to a river and this edge is subject to C2 flood risk. The development is being undertaken on the remainder of the site within C1 flood risk. Permission has been granted and site clearance is under way
CF13 (iii)	Glan Llyn	C1	There is an extant planning permission on the site which is under construction
CF13 (iv)	Llanwern Village	None	N/A
T1a)	Llanwern	C1	A Flood Risk Assessment will be required at the planning application stage for each of these sites. The exact location of the station is not currently known and the delivery of the site is outside of the remit of a LPA. Recent Hearing Session discussions may result in an amendment to the allocation to a safeguarding area.
T1b)	Coedkernew	C1	
W1	Waste	B/Part C2	The Council has included this site within the Plan as an existing commitment, to add clarity on where landfill capacity exists within the authority and safeguard it for continued use. The landfill element of the site currently has 16 years capacity with potential for a further 5 years agreed under the existing waste licence. Flood mitigation measures were implemented in 2006 in order to comply with the conditions of the waste licence, the Council does not therefore consider the action have been undertaken to address flood issues.

H16i	Hartridge Farm Road	Part C1	The proposed development is going to be sequentially located outside of the flood risk area. A site specific FCA will be required.
H15ii & H16ii	Former Ringland Allotments	None	N/A
H15i	Celtic Way	None	N/A

Appendix B: Stage 3 SFCA update (March 2014)