

**From:** [Sharp, Matthew \(Planning Policy Manager\)](#)  
**To:** [NDE](#)  
**Subject:** Newport City Council - Response to draft NDF  
**Date:** 15 November 2019 09:43:19  
**Attachments:** [draft-national-development-framework-response-form\\_Newport CC Response.doc](#)

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Hi,

Please find attached Newport City Council's response to the draft NDF. I'd be grateful if you could acknowledge receipt.

Many thanks

Matthew Sharp

**Rheolwr Polisi Cynllunio / Planning Policy Manager**  
**Adfywio, Buddsoddi a Thai / Regeneration Investment & Housing**  
**Cyngor Dinas Casnewydd / Newport City Council**

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu yn y ddwy iaith. Byddwn yn cyfathrebu â chi yn ôl eich dewis. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

The Council welcomes correspondence in English or Welsh or both, and will respond to you according to your preference. Corresponding in Welsh will not lead to delay.

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Pan fyddwch yn anfon e-bost at Gyngor Dinas Casnewydd, rydych yn cydsynio i'r Cyngor fonitro a darllen unrhyw e-byst o'r fath at ddibenion cydymffurfio â diogelwch ac â deddfwriaeth. I weld yr ymwadiad llawn ewch i <http://www.newport.gov.uk/ymwadiad>

### Consultation Response Form

|   |   |
|---|---|
| Your name                                       | Matthew Sharp                                       |
| Your address                                    | Civic Centre<br>Godfrey Road<br>Newport<br>NP20 4UR |
| Preferred contact details<br>(email/phone/post) |   |
| <u>Organisation (if applicable)</u>             | <u>Newport City Council</u>                         |

## 1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

| Strongly agree           | Agree                               | Neither agree nor disagree | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|-------------------------------------|----------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

| Agree with all of them   | Agree with most of them             | Agree with some of them  | Agree with none of them  | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- If you disagree with any of the 11 Outcomes, please tell us why:

Consideration could perhaps be given to merging some outcomes or perhaps adding an outcome on 'air quality'. Considering the importance of good air quality and it's a topical subject at present, it is given very little acknowledgement and consideration throughout the document. Although a minor point, 11 outcomes is an odd total.

The 11 outcomes set out on page 18 are worded slightly differently to those set out on pages 20/21 – consistency of headings would help.

## 2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

|                                 | Strongly agree           | Agree                               | Neither agree nor disagree          | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|---------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Urban areas (Policies 1, 2 & 3) | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Rural areas (Policy 4)          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Spatial Strategy. Newport Docks has not been identified as a strategic port. Although not a strategic port for ferries, it is argued that it is of national importance in terms of trading goods. The Docks has an ambitious masterplan and keen to develop further. This should be recognised by the NDF.

The illustrative map labels the main urban clusters of 'Wrexham and Deeside' and 'Swansea Bay and Llanelli' (echoing the text on page 24), however the 'Cardiff, Newport and the Valleys' label is not repeated on the illustrative map. It is simply shown as Cardiff and South East Wales. Newport should be identified and the map should include the same text as shown on page 24 for consistency purposes.

Intra-urban connectivity should also be shown as moving between east and west in the SE Wales region between Cardiff and Newport and not just from the Valleys heading southwards.

Page 22 - 'Co-locating homes, jobs and services means focusing on cities and large towns as the main development areas' – this is agreed. However, it could be interpreted as greenfield development should be avoided. Greenfield development and controlled expansion into the countryside is inevitable as there is simply insufficient brownfield land within urban boundaries. The Council agrees with the principle of developing brownfield land first, but this section of the NDF should include some policy text relating to urban extensions and sustainable development on the peripheries of settlements.

Policy 1 - The focus on sustainable travel is welcome, however the wording needs to be stronger to support car free development as a priority.

Policy 2 – Town centres traditionally have good transport links. Concentrating services in the city centre can maximise the use of sustainable travel options.

Policy 3 - This policy focuses upon transport - Air quality is not mentioned. A holistic approach that concentrates on the source of pollution is required. As a starting point the policy should state "All developments that generate road traffic has the potential to damage the environment. In areas of high population density developments that support sustainable travel methods (active travel and public transport) should be prioritised over the more traditional car centric design".

Policy 4 - Supporting our rural areas – it is appreciated that a large number of visitors come to Wales every year from around the world. However, the world needs to reduce the pollution caused by travel and visitors to Wales will expect this to be sustainable. There seems to be no plan to support this promotion of sustainable tourism in Wales, in particular transport. Tourists are more likely to see travel information and be agreeable to this one off behaviour change. Two resources that could benefit both the local community and tourists that visit –

1. Bespoke bus services that service areas of accommodation (campsites and hotels) and tourist attractions.
2. Car clubs – encouraging tourists to travel by train to rural Wales, once they arrive at the train station, a pool of low emission hire cars are available (as well as the option of the bus) to their respective accommodation.

Supporting and promoting car clubs across rural Wales in this manner will 1 – provide critical mass for private companies to consider this a viable business opportunity and 2 – support rural communities having access to car clubs that would normally only be supported in urban areas. Another policy could also encourage the regeneration of old disused petrol stations into electric vehicle charging hubs.

Rural suppliers – delivery hubs: limiting the use of large polluting HGVs by developing delivery hubs on main routes. The HGVs are able to deliver goods to a delivery hub and these are then transferred to the rural suppliers by low emission vehicles. The low emission vehicles pick up the products to be transported to the delivery hub to be transported out of the area. Supporting high-speed internet and community office space should be a priority to reduce vehicle movements.

### 3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

| Strongly agree           | Agree                               | Neither agree nor disagree | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|-------------------------------------|----------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

The first sentence in the policy supporting text notes that the Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised. The use of this wording is queried as this appears to be more of a political manifesto promise rather than a policy within a development plan?

The NDF advocates a regional approach. Whilst taking a regional approach to housing need is sensible, as it is a better reflection of how housing markets work rather than adhering rigidly to local authority boundaries, this should not be done at the expense of detail at a local level. It is vital that sustainable housing solutions are developed in areas where they are most needed. Working as a region should also not be a way for local authorities to divest themselves of meeting locally identified need in the hope it will be addressed elsewhere in the region.

Following the outcome of the recent independent review into the supply of affordable housing in Wales we are awaiting revised guidance on the production of Local Housing Market Assessments. It is difficult to comment of how LHMAs can support the delivery of this policy until we know what form they will take in the future.

The policy talks about delivering affordable housing where it is needed. We would caution against just using the figures from the LHMA as an indication of need. People don't necessarily ask for housing in areas where they know there is limited availability. Also, there will be areas with low levels of identified need for additional affordable housing units but where there are still housing issues that need to be addressed. For example, there will be areas where people are living in housing they can afford but it is poor quality, unsuitable for their needs or the community they live in is in need of regeneration to make it more sustainable. This kind of information is better captured in our Local Housing Strategy and we would advise also using this as a source of evidence of need.

In terms of Policy 28, we welcome the recognition of the strategic importance of Newport within the South East Wales region. We have evidence that the provision of new housing and associated infrastructure in Newport has attracted both people from neighbouring local authorities where property prices are higher and people from other areas of the region seeking to be closer to employment, transport links and services that the city provides. Working at a regional level will better reflect the impact Newport has on the region as a whole.

#### 4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

| Strongly agree           | Agree                    | Neither agree nor disagree          | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

The principle is supported, but when will these zones be identified? Is some form of supplementary planning guidance going to be prepared or is it for the SDPs to identify? Should the zones actually be identified as part of the NDF the same way as wind and solar potential areas have been identified?

## 5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

| Strongly agree           | Agree                               | Neither agree nor disagree | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|-------------------------------------|----------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

There is no mention of air quality.

The lack of charging infrastructure for ULEV vehicles limits their uptake, but also the current cost of the vehicles. The environmental consequences of electric vehicle batteries is yet to be fully realised. A privately owned vehicle is only used for 5% of its entire life. In addition to promoting ULEV, it is suggested that supporting and promoting car clubs is one method to increase the uptake of electric vehicles and at the same time reduce car ownership.

Reducing car ownership will increase public transport and active travel usage. Pooling the use of car clubs from local authorities, businesses and transport hubs should be a priority and listed alongside or in addition to this policy.

Emphasis on a nationally consistent approach to ULEV charging points could be something that the NDF could promote as well.

## 6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

| Strongly agree           | Agree                    | Neither agree nor disagree          | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The policy wording for Policy 8 is inconsistent with the other policies where it specifically states 'development plan strategies and policies'. Other policies have been more specific and refer to an SDP/LDP. The policy ignores the air quality impact road traffic and industrial emissions have on ecological receptors. Major planning decisions in England have been refused due to road traffic emissions on ecological receptors.

The acknowledgment of a national forest in Policy 9 is welcomed, but there is no indication of where it will be planted.

## 7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

|   | Strongly agree           | Agree                               | Neither agree nor disagree          | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Large scale wind and solar developments | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| District heat networks                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

Page 36 – Cumulative impacts of solar/wind should not only be assessed against settlements, but landscapes as well. In Newport, the internationally recognised and valued Gwent Levels have been and are subject to applications for large-scale proposals. The cumulative impact on this landscape is just as important as the impact on the settlement. The ability to mitigate these types of projects is not for LPAs, but Welsh Ministers as significant scale renewable energy developments are considered Developments of National Significance (DNS). Therefore is it considered appropriate to deal with such impacts at the NDF level.

Policies 10/11/12– how does this now impact non priority areas? – this is no different to the stance set out in PPW. The introduction to the NDF states that this document will not duplicate National Policy but this seems to be the case. The proposal to exclude Natura 2000 sites, National Parks and ANOB is not in accordance with PPW e.g. Paragraph 5.9.17 states that 'only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered'. It is understood that PPW will need to be modified following the adoption of the NDF.

Definition of 'large scale' should be considered, or an acknowledgement that 'large scale' is DNS.

It is suggested that Policy 13 (Other Renewable Energy Developments) could be integrated with Policy 11 (Wind and Solar Energy Outside of Priority Areas). What weight will the Energy Atlas have? Should the findings not be presented in the NDF? Could the Energy Atlas conflict with the priority areas identified in the NDF?

The policies are written with no consideration of the temporary nature of the development, which has been a key consideration particularly in terms of solar development. Guidance on what constitutes a temporary development is therefore sought. The current position seems to suggest that if the proposal is reversible on completion of the renewable energy supply then it is considered temporary. There is clear pressure for such developments to move from 25 years to 40 years permissions which raise the question of whether they remain temporary in nature. The environmental benefits and the need for such schemes are understood but it is considered more appropriate to consider these types of development in line with mineral planning principles without the over-reliance on the temporary nature of the scheme.

Policy 14 – This policy duplicates the requirement of PPW which states in paragraph 5.9.7 that, 'Development plans should support identified opportunities for district heating, local renewable and low carbon energy generation schemes, and the co-location of new proposals and land allocations with existing developments, heat suppliers and heat users'. The introduction to the NDF states that this document will not duplicate National Policy but this seems to be the case.

Policy 15 – We have limited experience with regard to District Heat Networks though fully understand that they will be required in order facilitate decarbonisation and that local authorities will play a key role in facilitating scheme development. There will need to be clear guidance for developers on preparing Energy Masterplans as well as supporting legislation that discourages standard gas heating systems and conversely to incentivise low carbon alternatives. There is a lack of policy direction with regards to low carbon heating systems.

There is no mention of tidal lagoons for the SE Wales region.

## 8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

| Strongly agree           | Agree                               | Neither agree nor disagree | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|-------------------------------------|----------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

Policy 16 – Strategic Policies for Regional Planning should include a ‘Sustainable Travel Strategy’ (Newport’s Sustainable Travel Strategy as an example).

## 9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

| Strongly agree           | Agree                    | Neither agree nor disagree | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>                   |
|--------------------------|--------------------------|----------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## 10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

| Strongly agree           | Agree                    | Neither agree nor disagree | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>                   |
|--------------------------|--------------------------|----------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## 11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

| Strongly agree           | Agree                               | Neither agree nor disagree | Disagree                 | Strongly disagree        | <i>Don't know</i>        | <i>No opinion</i>        |
|--------------------------|-------------------------------------|----------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Page 63: The existing Green Belt between Cardiff and Newport is missing. This is an established Green Belt designated in the Newport Unitary Development Plan 1996-2011 and should be reflected in this diagram. It is considered there should also be intra-urban connectivity between Cardiff and Newport. It is unclear why the 'Metro Symbol' is located above Barry.

It is understood that the precise boundary of the Green Belt will be set as part of the SDP. However, prior to the adoption of the SDP, how much weight will this indicative Green Belt hold? The Green Belt is positioned north of the M4, but how far north? Newport has experienced pressure from candidate sites in the Langstone area in the preparation of previous development plans. It is unclear whether Langstone is part of the Green Belt or not. Any Green Belt may also act as an obstacle to further development at the Celtic Manor Resort, which we would seek to avoid. Should this Green Belt remain in the NDF, it is considered that its boundaries should become less defined and text should clarify the status of the proposed Green Belt prior to the adoption of an SDP.

Policy 28. Newport's potential has been acknowledged and this is welcomed. However, it also needs to be acknowledged that some form of controlled expansion into the countryside on greenfield land will need to occur in Newport to meet growth potential, and consequently the NDF should have some reference and policy text on expansions into the countryside.

Policy 28 –page 64. It is noted that the document states that the SDP will need to consider the interdependence between Cardiff and the wider region. The fact that the existing Newport-Cardiff Green Belt is missing from the spatial diagram, combined with the sentence on interdependence is concerning. The existing Green Belt should be added to the diagram.

Page 66. '71,200 additional new homes are needed in the region until 2038'. This figure is not particularly aspirational considering the current batch of adopted LDPs have a housing requirement in excess of 110,000. The required 48% of additional homes being affordable is ambitious.

In general, Newport is pleased with the inclusion of Policy 28. However, it should be noted that significant parts of Newport remain in flood zones and we have serious transport constraints, namely the congested M4 and the troublesome Brynglas Tunnels. Air quality is also an issue around areas of the M4. Therefore, if Newport is expected to accommodate additional growth as set out in the draft NDF, we will need to work in partnership with Welsh Government to improve the infrastructure in Newport so the city is properly equipped to cater for the growth. Conversations with Welsh Government about investment in infrastructure, sustainable travel, are going to be key if Newport is to become a centre of national growth. The draft document notes that 'Welsh Government will maintain its commitment to tackling congestion on the M4'. This is reassuring to hear, but swift action is required and the situation cannot be allowed to continue indefinitely. It is understood that Welsh Government are considering alternative options and progress will be made shortly. Any commitments to new routes/sustainable travel alternatives should be covered in the NDF.

On page 65, under Policy 28 Newport, there is a drawing of Cardiff's Millennium Centre. It is unclear why this drawing is within the Newport policy section. Please can this be replaced with an appropriate drawing of Newport (perhaps the International Convention Centre for Wales?).

Policy 32 – Cardiff Airport. Whereas the Council understands the economic benefits of supporting the growth and development of Cardiff Airport, the Welsh Government has

recently declared a climate change emergency. Therefore there is a contradiction in messages here. Perhaps the negative environmental impacts should be considered and the NDF should set out how they could be mitigated (see comments on ISA below).

## 12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

- Paragraph 1.1.43 notes that 'Significant negative effects in the long-term were identified for policies P32 and P20 as they would encourage and support the expansion of Cardiff airport and the Port of Holyhead, both of which would be expected to lead to a potentially significant increase in greenhouse gas emissions as a result of increased air and shipping movements and associated vehicles. It is recommended that these proposals be subject to more detailed analysis of their contribution to emissions, which could then inform measures to mitigate these impacts. Confirmation as to what has happened with the recommendation is sought. It is also noted that the need to consider emission contributions is not referenced in the supporting text of Policy 32, which is surely a factor to mitigate this identified environmental impact.
- There were a number of recommendations from the ISA to the NDF. One of which was that the NDF 'could include greater focus on flood risk in Wales and how this will change as a result of climate change, particularly as the NDF seeks to support development in various regions where there is extensive flood risk such as Newport, Cardiff and Deeside'. There is not much in the NDF related to flood risk and increased housing development.
- Another recommendation was that 'the NDF could more closely consider the potential impact of dense development in urban locations on air quality and the

extent to which this can be managed through the design and layout of development.’  
There is not much in the NDF related to air quality and increased housing development.

### **13. Habitats Regulations Assessment**

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any ‘significant effects’ of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

The Habitat Regulations Assessment process notes that other development plans will need to take into account the HRA of the NDF to ensure the mitigation measures are adequately covered. It has been made clear in the LDP process that mitigation measures are to be set out in the development plan but in this case they have been left in the HRA report. This is not an obvious or previously recognised approach and leaving mitigation text within the HRA report is not considered appropriate. The current approach is not clear as to the mitigation measures required at other plan levels. It is proposed that relevant mitigation required for other levels of plan development are either set out in the NDF itself or a specific chapter/table is supplied in the HRA Report so that all measures are clearly set out.

## 14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

## 15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

### Chapter 1:

Whilst there has been much work undertaken to seek the development of a SE Wales SDP, it will not be in place for a number of years. An LDP would not be considered 'sound' if it were to base its strategy on a process yet to be defined. The weighting of the policies in the NDF prior to the adoption of an SDP is something that needs further clarification.

How do Area Statements fit in, is it not a requirement of development planning to have regard to these documents?

## **Chapter 2:**

Page 14 'Our visitors' - this section notes the value of tourism but it would be useful to note that this comes from our high class environment and heritage/cultural offers. This will assist in prioritising impact on these valuable areas from an economic perspective as well as for the usual social and environmental worth.

Page 14 'Our place in the world' - the loss of the M4 relief road and the continued transportation difficulties around the Newport area will not assist in achieving this objective of the NDF. Improvements to the traffic flow in this area will not only impact positively on the local population, but Nationally and indeed internationally, with trade from Ireland to mainland Europe.

Page 15 - Shoreline Management Plans have been mentioned, however, the update of these documents has not been a clear objective. For example, the current Severn Estuary SMP is being updated on only the English side of the border. The National Marine Plan and this document place an emphasis on this non-statutory document that should be kept up to date to reflect its importance.

Page 15 'Travel' - the support of only planned improvements to the National Cycle Network is short sighted and unlikely to look to 2040. Therefore, the text should be amended to look to the long-term improvements beyond those planned.

The challenges raised in this chapter are relevant for all levels of development plan development. Therefore it would be very useful for sources of information behind the headline issue to be referenced e.g. footnotes, to allow planning professionals to take a detailed look into the information and provide consistency of data sources.

- The lack of paragraph numbering (and pages in some instances) make the document difficult to reference.
- Page 17 'Prosperity and reducing inequality' - the first sentence does not read well.
- The manner in which policy text and supporting text are set out can be confusing e.g.
  - It is not clear why the text on page 30 comes before Policy 5 is set out?
  - It is not clear why Policy 27 is set out before the overview of South East Wales?
  - It is not clear why the supporting text for Policy 29 is after Policy 30?
- Definition of 'large scale' on page 43 to reflect 100+ residential units may have a big

impact on understanding of policies that look for 'significant or large scale' development. There is a potential concern that a precedent could be set in relation to what 'large scale' means.

- The text on page 65, second paragraph is confusing. A sub heading is required before the paragraph. It doesn't appear part of supporting text to Policy 28.
- Pages 70 & 71 – it would be useful to have a similar table listing how the policies link with the wellbeing targets.

**16. Are you...?**

|  |                                     |
|--|-------------------------------------|
| Providing your own personal response               | <input type="checkbox"/>            |
| Submitting a response on behalf of an organisation | <input checked="" type="checkbox"/> |

|  |                          |
|--|--------------------------|
| <b>Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here</b> | <input type="checkbox"/> |
|--|--------------------------|