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Dear Victoria,

**Newport City Council – Replacement Local Development Plan (LDP) Preferred Strategy
Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government on the Newport City Council Replacement Local Development Plan (LDP) – Preferred Strategy. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.

Without prejudice to the Minister's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) to minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.

In addition to compliance with Future Wales, national planning policies set out in Planning Policy Wales (PPW) Edition 11 seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). **We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process.** The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.

After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that sites KS7 and KS8 are not in general conformity with Future Wales: The National Development Framework, for the reasons stated below.

Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). **Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM.** Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:

Annex 1 – General Conformity with Future Wales

- Key Development Sites North Langstone KS7 and South Langstone KS8 – **not in general conformity**
- Regional Collaboration - **Further clarity/explanation on relationships and implications for the scale of growth is required**

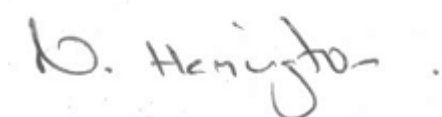
Annex 2 – Core matters that need to be addressed (PPW and the DPM)

- Housing Growth Levels – Clarification of Regional Collaboration
- Location of Growth Homes and Jobs – Clarification
- Maximising Affordable Housing Provision
- Delivery and Implementation - General
- Best and Most Versatile Agricultural Land (BMV)
- Gypsy and Travellers
- The Green Belt / Resilient Ecological Networks and Green Infrastructure
- Minerals
- Flood Risk
- Renewable Energy

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely,



Neil Hemington
Chief Planner Welsh Government

For matters relating to general conformity with Future Wales and planning policy please contact: PlanningPolicy@gov.wales / For matters relating to Local Development Plan procedures and compliance with the Development Plans Manual please contact: mark.newey@gov.wales and candice.coombs001@gov.wales

Annex 1 - Statement of General Conformity

The Welsh Government considers that key sites KS7 and KS8 - North and South Langstone are not in general conformity with Future Wales as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

This conformity statement is based on the evidence currently available. The Welsh Government reserves its formal position until the full suite of policies, proposals and finalised evidence base is available to scrutinise at Deposit Stage.

Reasons

Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The WG supports sustainable growth in national growth areas to respond to the climate change and biodiversity emergencies and make the best use of our resources.

Policy 1 and 33 of Future Wales states that Cardiff, **Newport** and the Valleys will be the main focus of growth and investment in the region. Future Wales's ambition is for Newport to accommodate strategic growth to both support Newport and to provide a focus for well-planned, co-ordinated growth across the region.

The WG considers that the scale of growth in the Preferred Strategy is in general conformity with Future Wales. However, the spatial identification of two strategic sites north and south of Langstone is of concern and considered to be contrary to the key policies set out in PPW/Future Wales.

Key Development Sites - KS7 North Langstone and KS8 South Langstone

It is recognised that Newport's Preferred Strategy is supported by a range of technical evidence in relation to urban capacity and housing growth levels. The strategic choices build on the strategy in the currently adopted LDP and planned major infrastructure investment in infrastructure such as new rail stations (See Annex 2).

Three strategic expansion sites are identified to the east of the City. We consider **that two key sites to the north of the M4 – North Langstone (KS7) and South Langstone (KS8) represent a form of strategic development that does not align with the place-making principles set out in Future Wales/PPW. The supporting text to Future Wales Policy 33 says:**

Cardiff, Newport and the Valleys are identified in policy 1 as a National Growth Area where development will be directed. This will be supported by policies 2, 3, 6 and 8 which will ensure that development is sustainably located with easy access to public transport and other public services. Towns and cities must grow in a sustainable way and in a way which promotes placemaking.

Future Wales Policy 2 - Shaping Urban Growth and Regeneration – Strategic Placemaking promotes building places at a walkable scale, with homes, local facilities, and public transport within walking/cycling distance of each other. Whilst the Preferred Strategy highlights that road, pedestrian and cycle measures will need to be incorporated into the development of these sites, **the**

description of measures is broad, generic and lacks the detailed understanding necessary to support the primary strategic allocations in a national growth area.

In addition, PPW, Llwybr Newydd and the South East Wales Transport Commission collectively emphasise the policy objective that development should reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport. The sustainable transport hierarchy in PPW, which prioritises active travel and public transport, is a fundamental Welsh Government principle that underpins Future Wales and Llwybr Newydd.

Sites KS7 & KS8 have documented issues that need to be resolved in relation to the impacts on the M4/Coldra Junction where all traffic will need to pass through this junction, even into Newport. The main access corridor will be the A48 on which there is currently limited bus services. The most likely outcome is that many residents will move to and from these sites by private transport, without significant improvements in the form of bus lanes/gates to access the sites. **It is therefore considered there is no evidence to justify how these sites conform to Future Wales Policies 2 and 33 and the WG Wales Transport Strategy, Llwybr Newydd.**

Regional Collaboration – Further clarity/justification

In the absence of an SDP, LDPs need to demonstrate how Future Wales's regional policies have been considered and demonstrate how they conform with Future Wales and Planning Policy Wales. Whilst Newport's Preferred Strategy appears to have taken into account the relevant policies, evidence of regional thinking and regional decision making is currently limited. It is disappointing that the Preferred Strategy for a key strategic city in a national growth area takes a predominantly local perspective of key regional issues. It remains the case that all LPAs must demonstrate how their individual LDPs have been informed by regional working.

The absence (as demonstrated by both recent and current ongoing statutory LDP consultations within the region) of any meaningful regional work and the opportunity to consider strategic issues across LPA areas is poorly developed, especially given functional relationships between neighbouring urban areas, exhibiting common spatial issues. **Moving forward to Deposit, further work will be required to understand how the Preferred Strategy has been developed within the wider regional context and how it will promote and enhance Newport's strategic role in the wider region, for example in the relationship to Torfaen and Monmouthshire Councils.**

Annex 2 – Core matters that need to be addressed (PPW and the DPM)

Spatial Strategy - Location of Growth

The Spatial Strategy Background Paper (BP) summarises the spatial options considered comprising:

Option 1: Previously Developed Land (PDL)

Option 2: Urban Extension(s)

Option 3: Defined Village Focus

Option 4: Hybrid Approach – 'the Preferred Spatial Strategy'

The Preferred Strategy seeks to maximise opportunities in the urban area prioritising the redevelopment and regeneration of land in the urban area, including the regeneration of the former Llanwern Steelworks at Glan Llyn and the former Whitehead Works for residential-led development, in addition to edge of settlement development at appropriate locations on the edge of the urban area. The Council are proposing a mixed strategy of brown and greenfield sites. **The WG does not object to the principle of this approach.**

The Council has undertaken a range of technical work in relation to urban capacity opportunities including a delivery assessment of the current land bank/allocations (LSH Urban Capacity/Supply BPs and the Housing Supply BP) which are supported and align with the requirements of PPW and the DPM. Collectively this technical work has concluded that there is a current landbank in Newport of 5,850 dwellings. **On this basis, 4,675 dwellings are required on new allocations** (See Table 1 below).

Our response in Annex 1 has explained our concerns regarding Key Sites KS7 and KS8 totalling 1,050 units, which we do not consider to be general conformity with Future Wales. In addition, we are unable to give **a firm view** on the spatial strategy at present as there are 1,830 units to be allocated 'predominantly within and on the edge of the urban boundary'. We do not object to the principle of this approach, however, **until the location, quantum, and the suitability of these sites in relation to their compliance with Future Wales and PPW is made explicit, we reserve the right to comment on the spatial strategy until all relevant detail is made available moving forward to Deposit.**

Housing Provision	10,530	WG Comments
Land Bank - <i>derived from the UCS/Housing Supply Review</i>	-5,850	No Concerns
New Allocations Required	4,680	
Key Site KS4 Langstone Road (<i>units in this plan period</i>)	-1,800 (<i>2,500 total capacity</i>)	Support in principle. Further work is required.
Key Site KS7 North Langstone	-750	General Conformity Objection
Key Site KS8 South Langstone	-300	General Conformity Objection
Units to be allocated on sites of 10-299 units	1,830	Unable to comment due to lack of detail. Reserve our position

KS4 - Langstone Road is a strategic site identified for (*not exhaustive*) mixed use development for up to 2,500 homes, including a district centre, leisure, school, green infrastructure networks and public transport infrastructure. **The WG does not object to the principle of the site, however, further work will be required at Deposit Stage to demonstrate compliance with the requirements of Llwybr Newydd, FW, PPW, the DPM** and to take into account the recommendations of the South-East Wales Transport Commission Report.

Masterplanning work at Deposit stage is essential to ensure that good urban design, placemaking principles and connectivity within the city centre and to other district centres/employment areas, firstly by active travel and public transport, are embedded into a key site-specific policy within the plan. The proposed masterplan/policy should maximise density at this location in accordance with FW Policy 12 - Regional Connectivity. Opportunities to provide improved bus/active travel linkages to and from the site, its key facilities and to its surroundings, and for people to access the proposed Llanwern Railway Station and Newport City Centre via the Metro improvements should be maximised. This may involve (*not exhaustive*) significant transport infrastructure. For example, additional provision on the north side of Llanwern station for bus interchange/cycle facilities and potentially a new park and ride. The development axis/master planning work should reflect those links where possible and active travel routes should be maximised to key transport nodes and facilities, both within and outside the site. **The Authority should engage with the Design Commission for Wales to ensure good placemaking principles are considered and embedded at the plan-making stage moving forward to Deposit.**

Infrastructure requirements should also be embedded within the site-specific policy in the plan to ensure comprehensive development, and to ensure developer contributions can be secured where necessary and appropriate.

The authority also needs to demonstrate how the various constraints and potential impacts on the Gwent levels have been addressed, including issues relating to biodiversity, landscape, flood risk and physical infrastructure. The Spatial Strategy Background paper states that the first units will be delivered on this site from 2025/26. Given the sites significance to the delivery of the growth and spatial strategy, it is imperative that the site is delivered in the timescales identified (see general comments regarding delivery and implementation).

The Level of Growth: Homes and Jobs

The City of Newport is in a National Growth Area identified in Future Wales Policy 1 (**See Annex 1**). The Preferred Strategy (Policy PS1) makes provision for 10,530 homes to deliver a housing requirement of 9,570 (638 p/a) over the plan period 2021-2036. The flexibility allowance is approximately 10%. The level of new jobs proposed is 8,640 (576 p/a) over the plan period.

Homes: The 2018 WG Principal projections are the latest projections for this Preferred Strategy. **Any future population and household projections based on the latest 2021 Census will need to be considered by the Council if they are published before the plan is examined.** The 2018 principal projection (*rebased to 2021 Census population and household figures*) would result in a requirement of 530 units per annum or 7,950 dwellings over the plan period. The level of housing growth proposed in the plan is around +1,620 units above the 're-based' WG-2018 projection. The housing requirement of 9,570 is -780 units less than the currently adopted plan.

The demographic evidence (LDP Demographics Update September 2022– Edge Analytics) has tested 11 growth scenarios that comprise: demographic led, dwelling led, and jobs led scenarios resulting in a range of 335 dpa to 838 dpa. Newport has generally experienced positive demographic trends in comparison with other LPAs in the region and across Wales, consistently seeing positive migration, natural change, and population growth in most age cohorts.

WG notes that historic completions rates in Newport have fluctuated over various time periods between 330 dwellings per annum and highs of around 950 dwellings per annum. Excluding the 'covid years' the past 10-year average completion rates for the period 2010-2020 is 638 dpa. When compared against the 10-year completion rate for the period 2013-2023 the average completion rate is 667 dpa. More recently, the past five-year completion rates 2015-2020 excluding 'covid years' is 838 dpa, in comparison, the past five-year completion rates from 2019-2023 are 576 dpa.

The Councils housing requirement is based on past delivery rates (638 dpa) over a 10-year period 2010-2020 excluding 'covid years' where housing delivery and employment growth began to slow due to the pandemic. This rate is considered by the LPA to be deliverable. The Council considers that this level of growth is appropriate as this 10-year period accounts for peaks and troughs, contributes to Newport's role in the National Growth Area, balances positive opportunities for new growth, while reflecting the quantity of brownfield land available and recognises the constraints to development, particularly on greenfield sites outside the urban boundary. It also provides positive opportunities for additional jobs and economic growth (see comments relating to job growth).

However, as explained in Annex 1, it is the view of **Welsh Government that limited evidence has been submitted in relation to how the level of growth in Newport has been considered in the regional context and further work is essential in respect of regional collaboration to demonstrate this conclusion.**

Jobs and Employment Land: The Council's dwelling-led growth option results in a requirement for 8,640 new jobs (576 p/a) over the plan period. This level of employment and job growth has been estimated based on the Council's preferred Dwelling-led growth scenario of 638 units per annum (Edge Analytics, Table 2). The level of jobs proposed is realistic and is considered by the Council to be sufficiently aspirational to continue to meet the growing ambitions of the City's economy and

drive prosperity in the wider city-region, the Cardiff Capital Region. The Welsh Government has **no significant concerns on the level of job growth proposed in the plan.**

The Council's Employment Land Review (February 2022) identifies a requirement for 77ha of employment land, which includes a 5-year buffer. The requirement is based on past trends and is largely to meet need in Newport (62ha) and address shortfalls across the region (15ha) as Newport is the only authority set for positive economic growth and maintains the largest employment land bank in the region.

The employment land requirement is proposed to be met on 6 allocations listed in Policy PS8, all of which have been rolled forward from the currently adopted plan. Whilst the Welsh Government does not object to the principle of this approach in line with the evidence, the Council must ensure that the allocations are suitable and deliverable and meet market demand to help achieve the plans job target. The Deposit plan should:

- Identify sustainable and deliverable employment allocations, that will contribute towards the job target and meet the need identified in the Employment Land Review.
- Safeguard key existing employment sites for retention for employment use, and
- Control the loss of existing employment land for alternative or ancillary uses.

In summary, and subject to the above clarifications, the Welsh Government has no substantial concerns with the level of homes and jobs proposed in the plan, which is considered to be in general conformity with Future Wales. Demonstrating delivery of the level of homes (and proposed sites) in the plan will be essential moving forward to Deposit stage as per the requirements of PPW and the DPM (see comments relating to delivery).

Maximising Affordable Housing Provision

The emerging LHMA shows that under the 'policy neutral' 2018 based projection the level of need is 590 dpa comprising 85% social rent and 15% intermediate tenure split. When using the re-based 2018 projection, the level of need is 530 units per annum. As the LHMA is not yet finalised, **it is unclear how the findings of the emerging LHMA have influenced the scale/location growth, albeit it appears to that a single housing market area covering the entire local authority has been used? By Deposit stage the authority must publish its LHMA.**

The LPA needs to demonstrate how the delivery of much needed affordable homes has been maximised by the chosen growth strategy. To maximise the supply of affordable homes, the Council should consider whether it would be appropriate to allocate sites for affordable housing-led developments where at least 50% of the homes will be affordable.

Welsh Language

Policy PS3 Sustainable Placemaking supports the long-term growth of the Welsh Language and recognises that the use of the Welsh language is growing in Newport. The Integrated Sustainability Appraisal (ISA) contains Objectives to support and increase the use of the Welsh Language, but it is unclear how these Objectives have been assessed in the ISA Growth and Spatial Options, the implications of the Welsh Language on the Preferred Strategy (if any) and whether this is a key issue for Newport.

Delivery & Implementation – General

In line with the key requirements of PPW, Chapter 5 of the DPM contains guidance on the key requirements in respect of the delivery and implementation of LDPs. The Deposit Plan should set out site-specific details for key allocations that includes general phasing timescales, key

infrastructure and placemaking principles (including concept/schematic masterplan frameworks), constraints and developer and infrastructure requirements, where appropriate.

The Council will need to demonstrate that both individual sites and sites in combination (including windfall assumptions) are deliverable through a housing trajectory prepared in conjunction with the Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have been 'rolled over' from the adopted plan would be advantageous to demonstrate sites will come forward in the identified timescales, otherwise this could have implications on delivery.

The Deposit plan should be supported by a high-level affordable housing study and site-specific viability appraisals for key sites, where appropriate. All viability work and its inputs must be prepared in conjunction with the Viability Steering Group and site promoters.

Gypsy and Travellers

The Council's Gypsy and Traveller Accommodation Assessment (2021) referred to in the Preferred Strategy (Chapter 9) does not form part of the evidence base. **Without an updated Gypsy and Traveller Assessment (GTAA) covering the entire replacement plan period, the type, level of need (if any) and the timescales for delivery are unclear.**

By Deposit stage the authority must publish its GTAA to meet its statutory duty and comply with the requirements in Planning Policy Wales (4.2.35), Circular 005/2018 (paragraph 35) and the Development Plans Manual (5.80-5.85) to allocate sufficient and deliverable sites in the plan for unmet gypsy and traveller need, if appropriate.

Agricultural Land

Preferred Strategy: Spatial Strategy / ISA - WG expects clear evidence demonstrating how Best and Most Versatile (BMV) policy was considered for each spatial and growth option. BMV agricultural land policy is partly considered under SA7-9- Natural Resources, however, it is unclear how the policy has been addressed in the ISA or the evidence used for the appraisal. There is limited evidence to demonstrate how BMV policy has been considered in the spatial strategy assessment, the site selection process or how the choices made in the LDP impact the BMV resource over the plan period. This requires further clarification.

Candidate Site Assessment Methodology - It is not clear how BMV policy is considered within the validation and assessment of candidate sites or how much weight is given to BMV policy in the site assessment methodology and relevant policies i.e. demonstrating 'considerable weight' is given to protecting BMV; the 'overriding need' for the site to be developed and the application of the sequential test approach. Table A.2 Candidate site framework and criteria states the Natural Resources objective '*To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.* It is not clear if 'higher grade' refers to BMV agricultural land as defined in PPW paragraph 3.58 & 3.59. It is also not clear if the Authority is using the most up-to-date evidence available (2019 ALC Maps) or how the evidence has been used in considering of the site selection process.

Renewable Energy: Policy CE10 - It is unclear how the policy for renewable energy projects and search areas addresses BMV policy (as clarified by the CPO letter of 1st March 2022) and high carbon soils (e.g. Peatlands). It is therefore unclear how the LDP conforms with Policies 9 and 17 of Future Wales and PPW in this respect.

In summary, WG expects BMV Policy to be considered at the earliest point in the process and throughout. BMV policy must be sufficiently evidenced and justified in the plan, sustainability appraisal, spatial strategy, and the weight afforded to BMV in site selection. **We do not consider**

that this has been clearly demonstrated in the Preferred Strategy, the ISA, site selection or the background documents. It is recommended that BMV Policy is specifically covered in the Deposit plan through a specific topic paper on how the policy has been considered, evidenced, and addressed in the plan. The Deposit plan should evidence any proposed allocations and demonstrate that considerable weight has been given to protecting BMV land and any loss minimised, in accordance with (TAN6 Annex B, PPW 3.58 & 3.58, FW Policy 9). We would advise the Council to contact our colleagues in Land, Nature and Forestry Division in relation to all comments made on BMV land.

The Gwent Levels

Policy 9 of Future Wales identifies the Gwent levels as one of nine National Natural Resources Areas which require a collaborative/cross boundary approach to planning policy going forward. The Gwent Levels have been recognised in Policy 9 (FW) as nationally important because of its biodiversity, numerous Sites of Special Scientific Interest (SSSIs), various priority species and for their network of ditches or reens, fen and reed bed habitats. The revised LDP should recognise the opportunities offered by the Levels and focus on maximising its positive attributes in line with Policy 9 of Future Wales.

Allocations should not compromise the overall integrity of the Gwent Levels or its features. For example, although reens and ditches on allocated sites may be located outside the Levels they could be feeding into watercourse systems on the Levels and have potential adverse impacts on the area as a whole.

The Gwent Levels should be referenced in relation to the strategic housing site KS4: Langstone Road, Llanwern because of the presence of ditches and reins on-site which could affect the wider Gwent Levels area e.g. as a result of impact from run-off.

The Green Belt

Newport's Preferred Strategy recognises the requirement to consider a Green Belt but concludes (para 8.1.58 – 8.1.59) that in the absence of a regionally agreed SDP the precise boundary of a Green Belt would be inappropriate to designate in the RLDP because it could be subject to change when an SDP is prepared. Newport proposes to maintain the local principles of the existing Green Wedges (as identified in the adopted LDP) to prevent coalescence of large towns/settlements, manage urban form and safeguard the countryside from encroachment.

The Welsh Government accepts that the precise boundaries of a Green Belt as described in Future Wales cannot be determined without agreement through a regional strategic approach. Early collaborative work between the region's authorities is encouraged to begin to scope out areas of focus and provide an evidence base to formulate a precise boundary.

Resilient Ecological Networks and Green Infrastructure

The imperative of achieving resilient ecological networks and effective green infrastructure should shape strategic and spatial choices at all scales. It is considered that more work is required to demonstrate how the Authority's Green Infrastructure Assessment (dated May 2022) has informed the Preferred Strategy; the climate emergency, reverse biodiversity decline and enable communities to benefit from more sustainable forms of managing natural resources.

Policies PS1 and PS2 do not list the Green Infrastructure Assessment as a key piece of information. It is important that biodiversity and ecosystem resilience considerations are considered at an early stage in plan preparation, PPW (6.4.4).

Minerals

The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in Newport. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a shortfall in crushed rock requiring new allocations totalling 11.3mt. The Deposit plan should explain how this shortfall will be met through a Statement of Sub-Regional Collaboration to be agreed in the “Former Gwent” sub-region. As there is a shortfall in provision, Newport should demonstrate with neighbouring LAs how the apportionment is being resolved.

KS8: South Langstone - Land south of Langstone is identified for residential development for up to 300 homes, SuDs and Green Infrastructure in the Minerals Safeguarding Areas for Sand and Gravel and Hardrock. The Preferred Strategy should demonstrate how the resource will not be sterilised, or future extraction hindered as a result of development, and / or to investigate whether the extraction of minerals prior to the commencement of development is practicable. This position will need to be clarified in the Deposit plan and clearly align with Policy PS18.

Flood Risk

Flood risk is a key issue for Newport due to its coastal and riverside location. A regional Stage 1 Strategic Flood Consequences Assessment (SFCA) has been prepared for the authority (November 2022) and has been informed by the emerging TAN15 and Flood Maps for Planning (FMfP). A recommendation of the study is to progress to a Stage 2 or Stage 3 SFCA, which focusses on flood risk associated with development sites proposed in the plan. **A Stage 2 or Stage 3 SFCA will need to inform the Deposit Plan if any of the allocations, particularly on key sites, are affected by flood risk.** Policies PS4 and PS12 should be amended to clarify that highly vulnerable development will not be permitted in Flood Zone C2 / Flood Zone 3 in accordance with national planning policy.

Renewable Energy

The Renewable and Low Carbon Energy Assessment was published in October 2020 in advance of the authority commencing their replacement Local Development Plan (LDP). The **renewable energy assessment is a key piece of evidence that must be updated to inform the Deposit plan** and reflect opportunities for renewable energy sources, particularly on key sites.

Future Wales: The National Plan 2040 identifies Newport as a Priority Area for District Heat Networks. The aforementioned study identifies opportunities for heat networks in Newport and this should be explored further by the authority with opportunities identified, where feasible, in the Deposit plan.

As part of updating the study and the identification (if any) of wind and solar search areas, the Council will need to consider the latest updates to Planning Policy Wales, particularly Chapter 6 (and the forthcoming publication of PPW 12) on addressing the nature emergency and the emerging TAN 15. The Council must ensure there is no outstanding objection from statutory consultees (i.e. Natural Resources Wales) if Local Search Areas were to be identified.
