



23<sup>rd</sup> October 2025

Our Ref: 23.139

Mr Grant Hawkins  
Planning Department  
Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dear Mr Hawkins,

**PROPOSED RESIDENTIAL DEVELOPMENT COMPRISING 26 AFFORDABLE DWELLINGS, A PUMPING STATION, LANDSCAPING, ACCESS, PARKING AND ASSOCIATED WORKS ON LAND AT TRASTON LANE, NEWPORT, NP19 4RQ**

**LPA REFERENCE NO. AKPA/ 25/0220**

On behalf of our client, Wellspring Homes, I enclose amended plans and additional information in support of the above application on land at Traston Lane, Newport, NP19 46Q.

This submission of amended plans responds to comments raised by statutory consultees following the original submission back in March 2025. Comments were raised by various consultees including Natural Resource Wales (NRW), the council's Tree officer, Landscape architect, Highways engineer and Ecologist. It also reflects the discussions held during the teams meeting held on Thursday 5<sup>th</sup> June 2025, which was attended by Grant Hawkins (Case Officer), Joanne Davidson (Local Authority Area Manager), George Baker (Project Flood Engineer, JBA Consulting), as well as other members of the project team.

**SUBMISSION DOCUMENTS**

To assist in the consideration of this proposal, you will find enclosed the following plans and documents relevant to the revised submission:

**CARDIFF OFFICE**  
22 Cathedral Road, Cardiff, CF11 9LJ  
02920 349737

**EXETER OFFICE**  
Winslade Manor, Manor Drive, Clyst  
St Mary, Exeter EX5 1FY  
01392 690060

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<b>DRAWING / DOCUMENT</b>	<b>REFERENCE</b>	<b>AUTHOR</b>
<b>ARCHITECTURAL</b>		
Proposed site layout	LT2413.04.01 Rev B	LeTrucco design architects
Proposed boundary identification plan	LT2413.04.03 Rev A	LeTrucco design architects
Boundary details	LT2413.04.04 Rev A	LeTrucco design architects
Proposed site elevations	LT2413.04.05 Rev A	LeTrucco design architects
Floor plans and elevations plots 1-2	LT2413.04.100 Rev A	LeTrucco design architects
Floor plans and elevations plots 3-4	LT2413.04.101 Rev A	LeTrucco design architects
Floor plans and elevations plots 5-6	LT2413.04.102 Rev A	LeTrucco design architects
Floor plans and elevations plots 7-9	LT2413.04.103 Rev A	LeTrucco design architects
Floor plans and elevations plots 10-11	LT2413.04.104 Rev A	LeTrucco design architects
Floor plans and elevations plots 12-13	LT2413.04.105 Rev A	LeTrucco design architects
Floor plans and elevations plots 14-19	LT2413.04.106 Rev A	LeTrucco design architects
Floor plans and elevations plots 20-22	LT2413.04.107 Rev A	LeTrucco design architects
Floor plans and elevations plots 23-26	LT2413.04.108 Rev A	LeTrucco design architects

## ENGINEERING

Engineering layout	2595-PHG-XX-XX-DR-C-000 P05	PHG engineers
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Tracking and visibility	2595-PHG-XX-XX-DR-C-0002 P02	PHG engineers
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Longitudinal section	2595-PHG-XX-XX-DR-C-0003 P03	PHG engineers
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Pumping station layout	2595-PHG-XX-XX-DR-C-0004 P02	PHG engineers
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Drainage strategy	2595-PHG-XX-XX-RP-C-0003 October 2025 issue 2	PHG engineers
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Surface water	2595-PHG-XX-XX-CA-C-0001-P02	PHG engineers
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Flood Consequence Assessment	TLN-JBAU-XX-XX-RP-Z-0001-P01.02	JBA Consulting
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## ECOLOGY, TREES AND LANDSCAPING

Preliminary ecological appraisal	October 2025 V2.0	Ecological services
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Bat transect survey report	October 2025 V1.0	Ecological services
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Reptile survey report	October 2025 V1.0	Ecological services
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Detailed soft landscaping proposals	TDA.3113.01	TDA
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Landscape specification and management plan	October 2025	TDA
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Green infrastructure statement	October 2025	TDA
Arboricultural impact assessment report	October 2025	Treescene
Arboricultural impact assessment plan	October 2025	Treescene
<b>OTHER</b>		
Covering letter	October 2025	LRM Planning
Sustainability matrix	October 2025	LRM Planning

The fee of £230.00 associated with this post-submission amendment will be paid shortly by the client.

## BACKGROUND

As you will be aware, the original planning permission for the residential development of 21 no. dwellings and associated works, was granted in August 2012 (Ref 05/0287) and was deemed to have been lawfully implemented by Newport Council under Ref 19/0255. A non-material amendment was subsequently granted on the site under Ref 21/1183, proposing various changes to the layout and design.

Two subsequent NMA's which aimed to shift the access road slightly and omit one of the dwellings to be replaced by a pumping station were refused by Newport City Council in September 2023 and February 2024 for having a scale and effect that was considered 'material'.

Following this, the applicant decided to prepare for the submission of a full application. The statutory Pre-Application Consultation (PAC) process was carried out between Friday 13<sup>th</sup> December 2024 and Friday 17<sup>th</sup> January 2025. Subsequently, a full application for 26 affordable dwellings and associated works including a pumping station was submitted to the local authority in March 2025.

During the validation process of the application, updates to Technical Advice Note 15 (Development, flooding and coastal erosion) meant that the application could either be determined under the old (2004) TAN 15 or the updated (2025) legislation. The authority confirmed that due to the application being validated in April, after the legislation was updated, that they would view the application under the new TAN15 and subsequently flagged heightened concerns regarding the flood risk of the site.

Following a Teams meeting held with the project team and the local authority in June 2025, where new and updated flood modelling data was presented by JBA Consulting, many of these concerns satisfied, subject to confirmation through the formal assessment. The findings revealed that in respect to flood risk,

the development meets the requirements set out in TAN-15 and the aims of Planning Policy Wales. These findings are expanded upon within the updated FCA by JBA consulting.

In addition to flood concerns, following the appraisal process, a number of statutory consultees raised other issues mainly regarding highways, trees, landscape and ecology. These have all been addressed in this submission of amended plans and are summarised within the next section of this statement.

## SUMMARY OF PROPOSED CHANGES

### **Flooding**

The original submission in March was supported by an FCA prepared by PHG engineers. However, as outlined above, feedback from NRW and the LPA flagged concerns with the flood risk of the site, as the new TAN15 was introduced in parallel to the application. Subsequently, new flood modelling data presented in the meeting held in June 2025 and detailed in the updated FCA by JBA consulting confirms that following the raising of site levels, it is predicted that the proposed dwellings will be flood-free in all design events, and importantly, the proposed development shall not increase flood risk elsewhere. As such, in respect to flood risk, the development meets the requirements set out in TAN-15 and the aims of Planning Policy Wales.

### **Trees**

Following feedback from the Tree Officer, all TPO trees are now correctly annotated, with RPAs shown consistently across all drawings. The revised layout has been informed by the tree constraints plan and arboricultural impact assessment (AIA). The AIA confirms that no unacceptable buildings, services, or landscaping is proposed within RPAs. Specifically, the main change has included the shifting of the access road slightly to avoid the RPA of T58.

The AIA also identifies that the overall tree quality is low on site, and that only trees in serious decline are proposed for removal, and that extensive new tree planting is proposed, ensuring the development enhances the overall tree cover and responds positively to previous concerns.

### **Landscaping**

Moreover, the local authority landscape architect requested professional landscape architect input to the project. In response to this, a soft landscaping plan and a landscape specification and management plan have been prepared by TDA in support of the application. Specifically, the soft landscaping plan shows that sufficient space exists around the pumping station for shrub and wildflower planting. This allows for a more attractive site entrance, buffering for the pumping station and improves the biodiversity value of the site. The hemp boundary fencing has been omitted and replaced with close boarded fencing.

### **Ecology**

Both the county ecologist and landscape architect requested that a revised green infrastructure statement was submitted which specifically refers to the stepwise approach set out in PPW and sets out biodiversity enhancement measures. As such, this submission of amended plans includes a revised green

infrastructure statement prepared by TDA and which covers all requested points in line with both local and national policy.

The county ecologist also raised a number of concerns regarding the ecological assessment and the potential for reptiles and roosting bats on site. A revised preliminary ecological appraisal has been prepared which responds to the points raised. In addition to this, additional reptile and bat transect surveys have been carried out on site. The results are summarised in the supporting bat transect survey and reptile survey report. No reptiles were found during the reptile survey and precautionary mitigation measures are proposed, with no further reptile survey work recommended. The bat transect survey found bat activity near the southwestern boundary of the site. A summary of mitigations can be found within the bat survey report, which includes a buffer along the southern boundary of the site, clear GI links throughout the site, and 25% of dwellings to include bat/bird boxes. The report concludes that these mitigations are acceptable and that no further bat survey work is recommended.

## **Highways**

The previously proposed highway design included access from Traston Road, providing a linear route running southeast to northwest across the site. Following feedback from the local highway authority, several minor amendments have been incorporated into the revised plans. These include:

- Removal of the layby at the site entrance;
- A consistent 5.5m-wide carriageway throughout;
- Relocation of the footpath to one side of the double driveways, reducing the width of footway crossings;
- Addition of cycle stores to the flats; and
- Parking spaces repositioned to sit closer to and better relate to the associated plots.

## **Site Layout**

In addition, as outlined above, the road layout has been adjusted to avoid the root protection area of tree T58. This amendment has led to minor layout changes across the site, summarised as follows:

- Units 1-4 repositioned due to the road alignment shift and now comprising 2-bedroom houses rather than 1-bedroom flats;
- Units 5-11 now proposed as 2-bedroom houses;
- Plots 12-13 now 3-bedroom houses adjoining the SuDS area at the western end of the site, which remains unchanged;
- Units 14-19 relocated to the opposite side of the road and comprise 1-bedroom flats;

- Units 20-22 unchanged in type, though parking has been moved to the side of each plot rather than the front, creating a more active street frontage;
- Units 23-26 remain as previously proposed, with parking realigned to follow the road layout and provide enhanced green infrastructure and amenity space along the entrance footway serving these flats; and
- Two visitor bays have been added at the site entrance. This totals 47 no. parking spaces across the whole site, in accordance with Newport's Parking Standards SPG (please see enclosed sustainability matrix for justification, and the site layout for a detailed breakdown).

## CONCLUSION

In summary, this submission of amended plans reflects design/layout changes and further ecological surveys carried out in response to consultee feedback from the council's ecologist, landscape architect, arboriculturist, highways engineer, NRW as well as changes brought about by the new flood modelling data provided by JBA Consulting.

These amendments are intended to support the Local Planning Authority in processing the application. I trust that these revisions address all of the outstanding issues raised regarding the site and support the progression of the application through to determination. I look forward to receiving confirmation of receipt. Should you have any questions or wish to discuss the proposals in further detail, please don't hesitate to get in touch.

Yours sincerely,



**Nia Williams**

Assistant Planner,  
LRM Planning

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