



Planning Statement

Oakley Court, Ruskin Avenue,
Rogerstone, NP10 0AA

July 2025

Ref. SP21-1061

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1. Introduction

1.1 This Planning Statement has been prepared by Simply Planning Limited (SPL), on behalf of our clients, DSI Ltd, and is submitted in support of a full application for the conversion and change of use of the roof spaces at Oakley Court, Ruskin Avenue, Rogerstone, NP10 0AA ('the Site') to provide an increase in the number of self-contained flats from 3 to 6 units, the proposals also include two additional parking spaces and biodiversity enhancement measures.

1.2 The full description of development is, therefore, as follows:

“Conversion and change of use of existing roof spaces to increase the number of self-contained flats from 3 to 6 units, together with the provision of two additional parking spaces and biodiversity enhancement measures.”

1.3 The application is supported by the following documents:

- Completed Pre-Application Forms;
- Supporting Planning Statement, prepared by Simply Planning; and
- The following architectural drawing package, prepared by JDW Architects Ltd:

Drawing No.	Title
jw1027-130	Site Location Plan & Block Plan
jw1027-139	Sections BLOCK 1, 2 & 3
jw1027-140	Proposed Site Layout
jw1027-B3-132	Existing Approved: BLOCK 3 Plans
jw1027-B3-134	Existing Approved: BLOCK 3 elevations
jw1027-B3-136	Proposed: BLOCK 3 Plans
jw1027-B3-138	Proposed: BLOCK 3 elevations
jw1027-B12-131	Existing Approved: BLOCKS 1 & 2 Plans
jw1027-B12-133	Existing Approved: BLOCKS 1 & 2 elevations
jw1027-B12-135	Proposed: BLOCKS 1 & 2 Plans
jw1027-B12-137	Proposed: BLOCKS 1 & 2 elevations

1.4 This supporting Planning Statement sets the planning context for the consideration of the application proposals. In particular, it assesses the proposal against the relevant policies of the statutory Development Plan, national guidance and non-statutory planning documents. It demonstrates that the proposal complies with the relevant guidance and policies. Accordingly, the development should be granted consent, in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

1.5 This Statement is structured as follows:

- **Section 2** sets out the factual background and development context, including a description of application site and surrounding area, the planning history and development proposals.
- **Section 3** reviews the Planning Policy context against which the proposals should be judged, including

Planning Policy Wales (Edition 12), Future Wales 2040 and the Newport Local Development Plan (2011 – 2026).

- **Section 4** considers the matters at issue and assessed the scheme against the Development Plan policies.
- **Section 5** draws our conclusions.

2. Factual Background

Site and Surroundings

- 2.1 The application site comprises a roughly L-shaped plot of land located to the west of Ruskin Avenue, Rogerstone, equating to approximately 0.49 hectares in size. Rogerstone forms a suburb at the edges of Newport city, with the city centre located approximately 5km to the west of the site.
- 2.2 The site consists of three residential blocks that have now been constructed following approval of application ref. 21/1040. The site benefits from vehicular and pedestrian access from Squires Gate Road. The site in its context is shown in red on the below image.



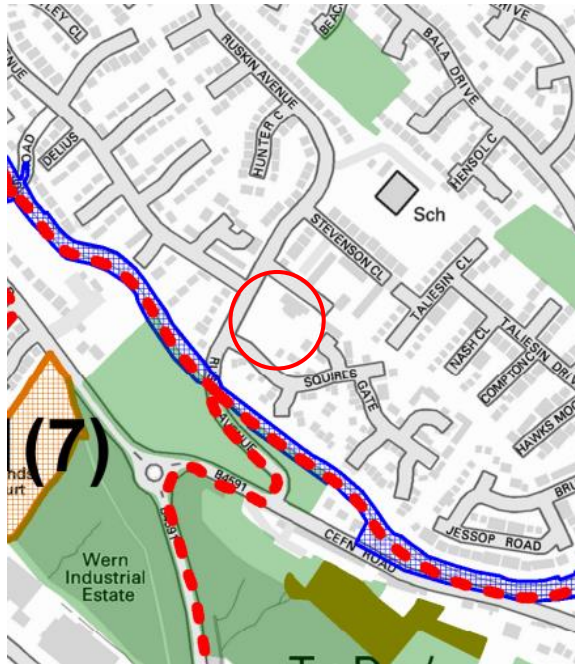
Approximate Site Location

- 2.3 The site comprises previously developed land that contained the location of the former Old Oak Stave Public House within the northern parcel of land, with its associated car park to the south. The public house formerly within the site has been demolished and construction of the residential blocks has been completed.
- 2.4 The site is located within a predominately residential area, with traditional semi-detached residential properties adjoining the site to the southeast in the cul-de-sac development off Squires Gate. Further residential properties of varying types and forms are located along Ruskin Avenue to the west of the site.
- 2.5 The site is not located within a Conservation Area and is not located within any close proximity to any known environmental, ecological or historical constraints. The site is located within Flood Zone A and is at little / no risk of flooding.
- 2.6 The site is located in a highly sustainable location, within c.100m walking distance to Rolls Walk, Mount Pleasant School and Ruskin Avenue bus stops. These transport modes have regular services to Newport City

Centre, other settlements within the wider Newport area and Rogerstone Train Station which is located circa 1.9km from the site. In addition, cycle route 47 runs to the south of the site off Ruskin Avenue, which is part of the National Cycle Network starting at Newport and finishing at Fishguard, passing through Neath and Carmarthen.

Policy and Site Constraints

- 2.7 The application site falls within the administrative boundaries of Newport City Council and so the relevant development plan for the determination of any planning application is the Newport Local Development Plan 2011-2026 ('LDP') and Future Wales: The National Plan 2040. An extract of the LDP Proposals Map is provided below with the site encircled in red.



LDP Proposals Map Extract

- 2.8 The LDP Proposals Map shows that the site is within the settlement boundary of Newport. There are no other policy designations upon the site.
- 2.9 An initial assessment of the site constraints related to the site are identified and addressed in the below table.

Site Constraints	Comment
Phosphates	The Welsh Government Data Map Wales shows that the site is not within a catchment area for Special Area of Conservation which has unacceptably high levels of phosphates.
Flood Risk – Development Advice Map	The NRW TAN 15 Development Advice Map shows the pre-application site is within Flood Zone A, it is at little or no risk of flooding.
Flood Risk – Flood Map for Planning	The NRW Flood Map for Planning for Wales shows the site as being within Flood Zone 1, so it is at little or no risk of flooding.
Coal Mining	The Coal Authority mapping system shows that the site is not within a Coal Mining Reporting Area.
Ecological Designations	The NRW Interactive Map viewer does not identify any ecological designations within the application site.

Site Constraints	Comment
Heritage	The site does not contain any Listed Buildings or non-designated heritage assets and is not within a Conservation Area.
Landscaping	The site is not within a Special landscape Area and has no landscape designations under the Local Development Plan.

2.10 Therefore, there are no policy or statutory constraints on the land which would be prohibitive to development taking place.

Planning History

2.11 A planning history search undertaken via the Newport City Council website yields the below results:

Application Ref.	Proposal	Decision	Date of Decision
03/1726	Erection of timber deck to provide beer garden with disabled ramped approach to car park	Approved	12/02/2004
14/0336	Development of 10no. apartments and associated works	Refused	08/08/2014
16/0350	Retention of former smoking shelter to office (a2) and associated alterations	Approved	22/08/2016
19/0587	Demolition of existing buildings and the erection of 6no. 4-bedroom residential dwellings, including access, parking, landscaping, bin storage and all associated works	Approved	06/12/2019
20/0696	Demolition of existing public house and construction of 21no. flats within 3no. blocks and associated infrastructure works	Approved	29/07/2021
21/1040	Demolition of existing public house and construction of 21no. Flats within 3no. Blocks and associated infrastructure works (part retrospective) (resubmission of 20/0696)	Approved	23/03/2022
23/0478	Nonmaterial amendment to vary condition 1 (approved plans) of planning permission 21/1040 for the demolition of existing public house and construction of 21no. Flats within 3no. Blocks and associated infrastructure works (part retrospective) (resubmission of 20/0696). Proposed amendments include changes to fenestration, rooflights, balustrade detail and dormer windows	Approved	20/07/2023
23/0754	Non-material amendment relating to planning permission 21/1040 relating to the demolition of existing public house and construction of 21no. Flats within 3no. Blocks and associated infrastructure works (part retrospective) (resubmission of 20/0696) to extend approved permeable parking to include for 1no additional parking space	Approved	22/09/2023

2.12 Application ref. 21/1040 and the subsequent Non-Material Amendments are of most relevance to this application. This development has recently completed construction and it is the roof spaces of each block approved as part of the scheme this application seeks to change the use to introduce 3 No. additional flats. Further details of the proposal are discussed below.

Proposed Development

2.13 This planning application seeks permission for the change of use of the roof space at the application site to

provide one additional unit in each block for a total of 6 No. flats from the existing 3 No. flats. The proposal also seeks to incorporate an additional two parking spaces and biodiversity enhancement measures.

- 2.14 The scheme seeks to make optimal use of the consented roof spaces which has comfortable room to provide one additional unit in each block. Each flat will contain two bedrooms, one bathroom and a living / kitchen space.
- 2.15 It is worth noting that the number of bedrooms within the consented flats to be sub-divided as part of the proposal would not be reduced, as each flat would retain two bedrooms after conversion. Moreover, for avoidance of doubt, the conversion and change of use of the roof space will have not alter the external appearance of the any of the blocks. The blocks are identical height, scale and footprint.
- 2.16 It is anticipated that the proposed units will utilise the existing parking, cycle and access arrangement, as part of the wider residential scheme. As we go on to demonstrate, these arrangements are wholly appropriate and capable of accommodating the 3 additional flats. This will be aided by the fact this proposal seeks to incorporate an additional two parking spaces to the north of the site in the existing parking area, increasing the overall parking provision from 51 to 53 parking spaces.
- 2.17 It is appreciated that the additional two parking spaces will result in the loss of 29.4 sq.m of green space. Hence, this submission is supported by a Biodiversity Enhancement Plan in order to offset the impact the proposed parking may have on biodiversity. The Biodiversity Enhancement Plan includes the following measures:
- 3 No. RSPB Burford Bat Boxes
 - 2 No. Igloo hedgehog Shelters
 - 3 No. RSPB Classic Nest Box
- 2.18 The above biodiversity enhancement measures are considered to greatly outweigh the impact of the loss in a small amount of green space, this will be explored further within the '*Green Infrastructure*' section of this planning statement.

3. Relevant Planning Policy

- 3.1 This section of the Planning Statement outlines the key national and Development Plan policies that are relevant to the determination of this pre-application.
- 3.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the Development Plan and that determination shall be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.3 The Development Plan for the pre-application site is the Newport Local Development Plan (2011 – 2026), as well as Future Wales 2040.
- 3.4 Planning Policy Wales (Edition 12), Technical Advice Notes (TAN's) and Supplementary Planning Documents / Guidance are also important material considerations.

Planning Policy Wales (Edition 12)

- 3.5 Planning Policy Wales Edition 12 (PPW) was published in February 2024, and this sets out the land use planning policies of the Welsh Government. The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 (WBFG Act) and other key legislation.
- 3.6 The WBFG Act places a duty on public bodies to carry out sustainable development. This is not a new concept for the planning system as the principles of sustainable development have been at the heart of planning policy since PPW was first published in 2002. However, the concept has been expanded under the WBFG Act and it requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.
- 3.7 Paragraph 1.18 of PPW confirms that a plan led approach is the most effective way to secure sustainable development and that:

“Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.”

- 3.8 Chapter 2 of PPW introduces the concept of ‘Placemaking’ and paragraph 2.1 states the following:

“Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities.”

- 3.9 PPW also defines placemaking as the following:

“Placemaking” is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense.

Placemaking considers the context, function and relationships between a development site and its wider surroundings. This will be true for major developments creating new places as well as small developments created within a wider place.”

- 3.10 Paragraph 2.13 of PPW 12 states that:

“The plan-led system underpins the delivery of sustainable places. To ensure all development plans and decisions taken by the planning system work together to deliver sustainable places. The 5 Key Principles (see Figure 4) represent a guiding vision for all development plans, including the NDF.”

3.11 Figure 4 of PPW12 provides the key planning principles which are as follows:

- *Growing our economy in a sustainable manner;*
- *Making best use of resources;*
- *Facilitating accessible and healthy environments;*
- *Creating and sustaining communities;*
- *Maximising environmental protection and limiting environmental impact.*

3.12 In providing context for the fourth key principle, creating and sustaining communities, PPW 12 states under figure 4 of page 17 the following:

“The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives...”

3.13 Paragraph 2.17 of PPW 12 states:

“In responding to the key principles for the planning system, the creation of sustainable places and in recognition of the need to contribute to the well-being of future generations in Wales through placemaking, development plans and development proposals must seek to deliver development that address the national sustainable placemaking outcomes.”



3.14 Paragraph 4.2.2 outlines that the planning system must:

- identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;

- enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and
- focus on the delivery of the identified housing requirement and the related land supply.

3.15 Paragraph 4.2.11 states that the supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period.

3.16 Paragraph 4.2.14 advises that as part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and housebuilders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of housebuilder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs) and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement.

3.17 The proposals are fully consistent with the principles established within PPW12 and the development meets a number of the national sustainable placemaking outcomes contained within national planning guidance, in particular, the need to sustain communities.

Future Wales – The National Plan 2040

3.18 The National Development Framework ‘Future Wales- The National Plan 2040’ (NDF) was published on 24th February 2021. This document sets a framework for planning the change and development in Wales over the next two decades.

3.19 Policy 1 (Where Wales Will Grow) of the Future Wales – The National Plan 2040 (NDF) relates to where Wales will grow. It identifies both National and Regional Growth Areas. Three National Growth Areas are identified within the policy, with one of these being ‘Cardiff, Newport and the Valleys’, which the application site falls within.

3.20 Policy 2 (Shaping Urban Growth and Regeneration – Strategic Placemaking) relates to the location of development and amongst other criteria, states:

“The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities;*
- *establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*

- *integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.*

Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time."

3.21 Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) sets out the following:

"Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region..."

3.22 It is clear that residential development is encouraged in Newport, as part of the National Growth Area.

Newport Local Development Plan 2011-2026 (LDP)

3.23 The Newport City Council Local Development Plan covers the period 2011 to 2026. It was adopted in January 2015 and comprises the statutory Development Plan for Newport City.

3.24 Policy SP1 (sustainability) states that *"proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary"*. They will be assessed in this context as to their potential contribution to:

- The efficient use of land;
- The re-use of previously developed land and empty properties in preference to greenfield sites; and
- Providing integrated transport systems, as well as encouraging the co-location of housing and other uses which will minimise the need to travel, reduce car usage and encourage a model shift to more sustainable modes of transport.

3.25 Policy SP2 states that proposals should seek to maximise their positive contribution to health and well-being and minimise any negative effects by being located in the most sustainable locations, close to public transport links and other green infrastructure.

3.26 Policy SP10 (House Building Requirement) indicates that provision is made for 11,623 units to deliver a housing requirement of 10,350 units over the plan period. The land will be provided primarily on previously developed land including on infill, windfall and small sites.

3.27 Policy SP18 (Urban Regeneration) supports development which assists the regeneration of the urban area, particularly the city centre and the reuse of vacant, underused or derelict land.

3.28 Policy GP1 (General Development Principles – Climate Change) states that development proposals should:

- Be designed to withstand the predicted changes in the local climate and to reduce the risk of flooding on site and elsewhere by demonstrating where appropriate that the risks and consequences of flooding can be acceptably managed, including avoiding the use of nonpermeable hard surfaces;

- Be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where practicable;
- Be designed to reuse or recycle existing construction materials present on the site;
- Meet the relevant BREEAM or code for sustainable homes level.

3.29 Policy GP2 (General Development Principles – General Amenity) indicates that development will be permitted where, as applicable:

- There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality;
- The proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area;
- The proposal seeks to design out the opportunity for crime and anti-social behaviour;
- The proposal promotes inclusive design both for the built development and access within and around the development;
- Adequate amenity for future occupiers.

3.30 Policy GP4 (General Development Principles – Highways and Accessibility) indicates that development proposals should:

- Provide appropriate access for pedestrians, cyclists and public transport in accordance with national guidance;
- Be accessible by a choice of means of transport;
- Be designed to avoid or reduce transport severance, noise and air pollution;
- Make adequate provision for car parking and cycle storage;
- Provide suitable and safe access arrangements;
- Design and build new roads within private development in accordance with the highway authority’s design guide and relevant national guidance;
- Ensure that development would not be detrimental to highway or pedestrian safety or result in traffic generation exceeding the capacity of the highway network.

3.31 Policy GP6 is a general, overarching key policy which applies to all development. It states that good quality design will be sought in all forms of development. The aim is to create a safe, accessible, attractive and convenient environment. In considering development proposals the following fundamental design Principles should be addressed:

- Context of the site: all development should be Sensitive to the unique qualities of the site and respond positively to the character of the area;
- Access, permeability and layout: all development should maintain a high level of pedestrian access, connectivity and laid out so as to minimise noise pollution;

- Preservation and enhancement: where possible development should reflect the character of the locality but avoid the inappropriate replication of neighbouring architectural styles. The designer is encouraged to display creativity and innovation in design;
- Scale and form of development: new development should appropriately reflect the scale of adjacent townscape. Care should be taken to avoid over-scaled development;
- Materials and detailing: high quality, durable and preferably renewable materials should be used to complement the site context. Detailing should be incorporated as an integral part of the design at an early stage;
- Sustainability: new development should be inherently robust, energy and water efficient, flood resilient and adaptable, thereby facilitating the flexible reuse of the building. Where existing buildings are present, imaginative and sensitive solutions should be sought to achieve the re-use of the buildings.

3.32 Policy H2 (Housing Standards) indicates that residential development should be built to high standards or environmental and sustainable design, taking into account the whole life of the dwelling.

3.33 Policy H8 (Self Contained Accommodation and Houses in Multiple Occupation) specifically relates to conversion of existing residential space to self-contained flats and is the policy of most relevance to this application. Policy H8 sets out the criteria proposals must meet in order to be acceptable, how the proposal meets these criteria is addressed in the section below.

4. Matters at Issue

4.1 Having set the planning context against which the proposals should be judged in the preceding section, we now consider the proposals against that guidance, alongside any other relevant considerations.

Principle of Development

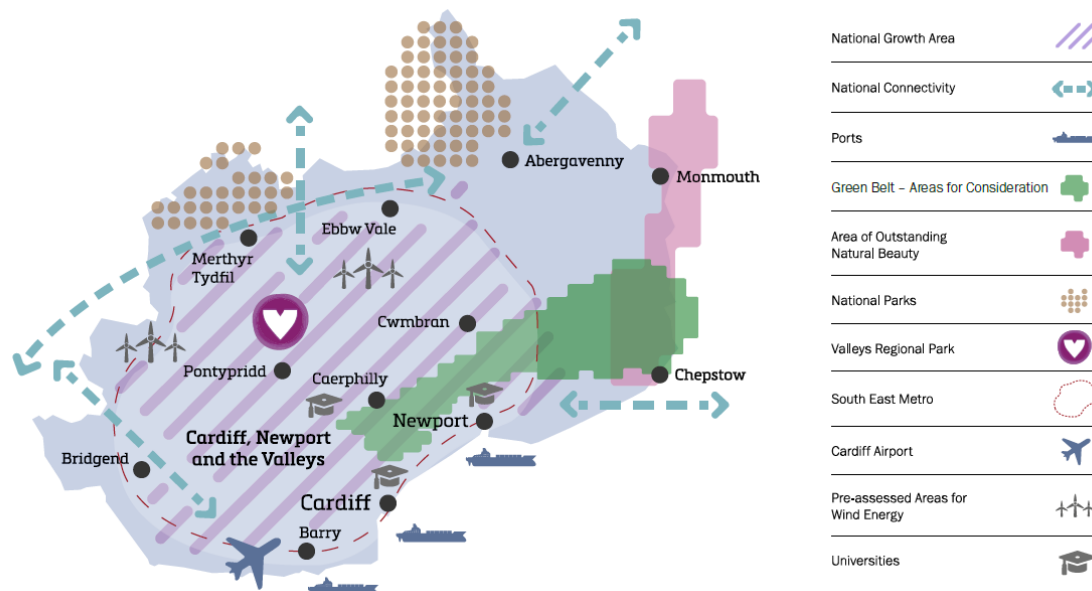
4.2 From the outset, it must be acknowledged that the site already has consent for residential use by virtue of application ref. 21/1040 and has completed construction of the development. This application seeks to incorporate one additional unit into the roof of each block consented under this approved residential scheme, as well as introduce two new parking spaces together with biodiversity enhancement measures.

4.3 Notwithstanding this, the acceptability of the proposals is addressed below.

Future Wales

4.4 Policy 1 of Future Wales 2040 relates to 'Where Will Wales Grow' and it identifies three National Growth Areas where there will be growth in employment and housing opportunities, with one National Growth Area being 'Cardiff, Newport and the Valleys'.

4.5 Policy 33 of Future Wales relates to the Cardiff, Newport and the Valleys National Growth Area and this states that the growth area will be the main focus for housing growth within the Southeast region. The supporting regional strategic diagram on page 163 confirms that Newport falls within the National Growth Area.



Regional Strategic Diagram

4.6 The application site is located on underutilised existing residential land within Newport, being designated as a National Growth Area, Newport is capable of supporting additional housing growth, especially on underutilised land. Therefore, the scheme should be considered acceptable in-principle.

4.7 Therefore, the proposed development of 3 additional dwellings in the National Growth Area is supported, in principle, by the Policies of Future Wales.

Local Development Plan

- 4.8 Strategic Policy SP1 (Sustainability) of the LDP outlines that development will be concentrated in sustainable locations on brownfield land within the settlement boundary. In particular, the policy stipulates that applications will be assessed as to their potential contribution to *'the efficient use of land'*.
- 4.9 This goes to the heart of what the proposal seeks to achieve, making best use of an existing residential development, which already has consent for residential use within the settlement boundary. Under its current consent the roof spaces are being underutilised only providing one two bed unit when they are clearly of capable size to provide two units.
- 4.10 This also goes for the additional parking and biodiversity enhancement measures. The site is clearly capable of providing these additional features, which significantly improve upon the existing built out scheme in terms of highways and biodiversity benefit. The proposals will make the best and most efficient use of the land, in accordance with Strategic Policy SP1 of the adopted local plan.
- 4.11 Further to the above, Policy H8 is also of relevance to this application. Policy H8 supports the subdivision of a property within defined settlement boundaries if the scale and intensity of use does not harm the character of the building and locality.
- 4.12 As will be discussed in the *'design'* section the proposal makes no external alterations to the existing building and, therefore, will result in no adverse impact on character of the surrounding locality. This is in accordance with Policy H8.

Housing Delivery Under the LDP

- 4.13 Strategic Policy SP10 (House Building Requirement) sets out a requirement of 11,623 new homes in Newport over the Plan period. Of these 11,623 new dwellings, 533 are expected to come forward as small sites (below 10 units).
- 4.14 The application site is not allocated for housing, however, is an existing residential site and would provide 6 dwellings within the settlement limits of Newport. As the development entails the provision of 6 flats, it would be defined as a small site by the LDP.
- 4.15 Review of the latest Local Development Plan Monitoring Report (2024) shows the LPA are 11% short of the LDP target in terms of the number of delivered homes.
- 4.16 In addition, the same report states that only 273 small site completions have been achieved over the past 5-years. This is just over half the required amount within the LDP Target.
- 4.17 Given the above, there is an acute need for more housing within the Authority. Three additional dwellings can make a small, yet important contribution to the housing supply within Newport, given the importance small sites play in meeting the Local Plan housing requirement.

Design

- 4.18 Policy H8 (Self Contained Accommodation) of the LDP sets a number of criteria for how development proposals to subdivide a property into self-contained accommodation should be assessed. The most relevant criteria to this scheme are as follows:

- (a) The scale and intensity of use does not harm the character of the building and locality;

- (b) The Proposal will not cause an unacceptable reduction in the amenity of neighbouring occupiers or result in on street parking problems;
- (c) Adequate noise insulation is provided; and
- (d) There is adequate amenity for future occupiers.

4.19 The scheme is compliant with the relevant criteria of Policy H8 as set out below.

External Appearance

- 4.20 As previously discussed, the conversion of the flats within the roof space will not result in any changes to the external appearance of the building. The existing flats benefit from being a sufficient enough size to accommodate the conversion without the need to extend or change the form / scale of the existing building.
- 4.21 This is evidenced by the submitted plans and drawings, which show the proposed elevations remain unchanged when compared to the existing.
- 4.22 In regard to the two additional parking spaces, these form part of the existing parking area to the north and as such are minor additions to an established parking zone. This is not considered to materially affect the appearance of the overall site and can therefore be considered an acceptable addition.
- 4.23 Given there will be no material change to the consented (and built out) design, the proposal will result in no adverse impacts on the existing building or surrounding character of the locality. The proposal is, therefore, compliant with the design criteria set out in Policy H8.

Amenity of Future Occupiers

- 4.24 Policy H2 (Housing Standards) of the LDP states that residential development should be built to high standards in accordance with adopted Supplementary Planning Guidance (SPG). The Flat Conversions SPG (adopted October 2021) is of most relevance to this application and sets out the amenity standards for future occupiers of flat conversion schemes.
- 4.25 The guidance states that the minimum desired standard for a two-bedroom converted flat is 58 sq.m of gross internal floor space. The retained and proposed two-bedroom flats would have a internal floor area of 66 sqm, so even after subdivision the flats would be well above the Council's minimum adopted standards.
- 4.26 The buildings have also been designed to ensure that they receive adequate sunlight and daylight in every habitable room, as well as an acceptable outlook and no overlooking between the flats within the development.
- 4.27 The proposed sections show that the rooflights in bedrooms would have a lower cill height of 1.29m and a upper edge of the window of 2.09m, ensuring that outlook through the windows would be easily achievable and directly comparable to the outlook of a traditional window within a residential flat.
- 4.28 In regard to outdoor amenity space, the proposal will utilise the existing communal outdoor space associated with the consented residential scheme already built out at the site. This already provides 860 sq.m of communal amenity space and is considered more than capable of accommodating the 3 additional flats.
- 4.29 Further to the above, the site is in close walking distance to public open spaces, this includes Mount Pleasant Open space (6-minute walk) and High Cross Open space (12-minute walk). The future occupiers will have sufficient outdoor amenity space accordingly.

4.30 Considering the above, the proposed flats will have sufficient internal and external amenity space compliant with adopted SPG Guidance and Policy H2.

Impact on Adjoining Residents

4.31 Policy GP2 (General Amenity) states that new development will be permitted where there will not be significant adverse effect on local amenity.

4.32 As discussed above, the proposal seeks no elevational changes to the existing building as part of the conversion works. This includes no additional windows as part of the conversion works, the existing flats benefit from a sufficient number of windows in optimal locations for the conversion to be undertaken without having to alter the existing arrangements.

4.33 As this existing window arrangement was considered acceptable in terms of neighbouring amenity as part of application ref. 21/1040, it can also now be considered acceptable given it remains unchanged.

4.34 In regard to noise, it is not considered that the proposal will result in any adverse impact in terms of noise the site is already in residential use and will already generate typical residential associated noise. Moreover, the proposed units are entirely kept within the roof space at significant height and distance from neighbouring properties, and as such results in no adverse impact.

4.35 With regard to the above information the proposal will result in no adverse impact on neighbouring properties and is in accordance with Policy GP2.

Transport and Sustainability

Active Travel & Public Transport

4.36 Policy GP4 of the LDP relates to '*Highways and Accessibility*', this policy states that all development must be located and designed in a way that minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, education, local services and community facilities.

4.37 As previously mentioned, the site is in an established highly sustainable residential area, within the settlement limits of Newport. The site is within c.100m walking distance to Ruskin Avenue bus stops. These transport modes have regular services to Newport City Centre and other settlements within the wider Newport area. Rogerstone Train Station is also located circa 1.9km from the site. In addition, cycle route 47 runs to the south of the site off Ruskin Avenue, which is part of the National Cycle Network starting at Newport and finishing at Fishguard, passing through Neath and Carmarthen.

4.38 In regard to services and facilities, the site is within walking distance of the following services and facilities to name a few:

- Mount Pleasant Primary School (100m or 2-minute walk)
- Mount Pleasant Open Space (0.3 miles or 6-minute walk)
- Rising Sun Public House (0.4 miles or 8-minute walk)
- Premier Convenience Store (0.4 miles or 9-minute walk)
- Tesco Express (0.6 miles or 14-minute walk)
- Bethesda Baptist Church (0.6 miles or 14-minute walk)

- 4.39 Given the above, the proposal is considered to be in a highly sustainable location, wholly appropriate for residential development.
- 4.40 Therefore, we consider that the site promotes safe, sustainable and healthy forms of transport in accordance with Policy GP4 of the LDP.

Highway Impacts

- 4.41 Policy GP4 of the LDP states that development proposals should provide appropriate access and ensure that development would not be detrimental to highway safety.
- 4.42 The proposal will utilise the two existing accesses off an un-named road and Squires Gate. This access has already been approved and considered appropriate as part of application ref. 21/1040.
- 4.43 Notwithstanding this, it is acknowledged that the access and wider highway network will be utilised by the occupants of the additional 3 dwellings. This is not considered to be a significant enough increase to result in any adverse highway impacts.
- 4.44 The Officer's Report as part of the original application on site (ref. 21/1040) found that the proposal would be betterment on the existing position, calculating the residential use would generate 600 less trips daily than the previous A3 use. The introduction of 3 additional units as part of this proposal will not come near to closing this gap and the highway network is more than capable of the minor increase in vehicles.
- 4.45 As such, the proposals would make little difference of the core, strategic and local highway network, in accordance with Policy GP4 of the LDP.

Cycle Parking

- 4.46 The Sustainable Travel Supplementary Planning Guidance requires 1 long stay cycle space per every 2 bedrooms. In its existing form each residential block already contains a secure cycle shelter capable of storing 8 bicycles. The proposal seeks to utilise this existing cycle parking arrangement that was approved as part of application ref. 22/0792.
- 4.47 Currently each block contains 14 bedrooms and as such requires 7 cycle spaces, the proposal will introduce another 2 bedrooms to each block, resulting in a total need for 1 additional cycle space, making 8 cycle spaces in total. As per the approved plans within application ref. 22/0792 the existing cycle storage units are capable of providing 8 cycle spaces.
- 4.48 The proposals show this quantum of cycle storage provision can be easily provided at the secure, sheltered storage unit, located at prominent location near the site access.
- 4.49 In light of the above, the utilisation of the existing cycle parking at the site is wholly appropriate and in accordance with the adopted SPG.

Car Parking

- 4.50 Policy H8 requires proposals for flat conversions to not result in an adverse impact upon on street car parking.
- 4.51 The proposal will use the existing parking arrangement utilised by the wider residential scheme, as well as the two additional spaces proposed through this application. This parking arrangement provides 53 parking spaces for all the residential units.
- 4.52 Provided in the table below is an assessment of the development and the current proposals against the relevant parking SPD standards:

No. of Units	No. of Bedrooms	Parking Requirement	Visitor Parking Requirement	Total Parking Requirements	Number of Spaces
21	42	42	4	46	51
24	48	48	4	52	53

4.53 The above table demonstrates that the addition of 6 bedrooms has required an increase in the number of parking spaces by 6. However, the approved development provided an excess of five parking spaces against the Council’s adopted standards. The proposed development would require 48 spaces and 4 visitor spaces making 52 spaces required in total.

4.54 With the addition of two further spaces, the proposals would provide 53 spaces in excess of the standard required. Given the above, the proposal will result in no dependence upon on street parking, compliant with the criteria set out in policy H8 and the adopted SPG.

Waste Collection and Drainage

4.55 The proposal will utilise the existing waste collection and drainage arrangements on site, this is considered more than capable of accommodating the additional 3 units.

Green Infrastructure Statement

4.56 Paragraph 6.2.12 of Planning Policy Wales Edition 12 states that a Green Infrastructure Statement (‘GIS’) should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants.

4.57 PPW12 confirms that the GIS will be an effective way of demonstrating multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the stepwise approach has been applied.

4.58 Figure 12 of PPW12 provides the diagrammatic summary of the stepwise approach which is provided below.

Figure 12: Summary of the Step-Wise Approach

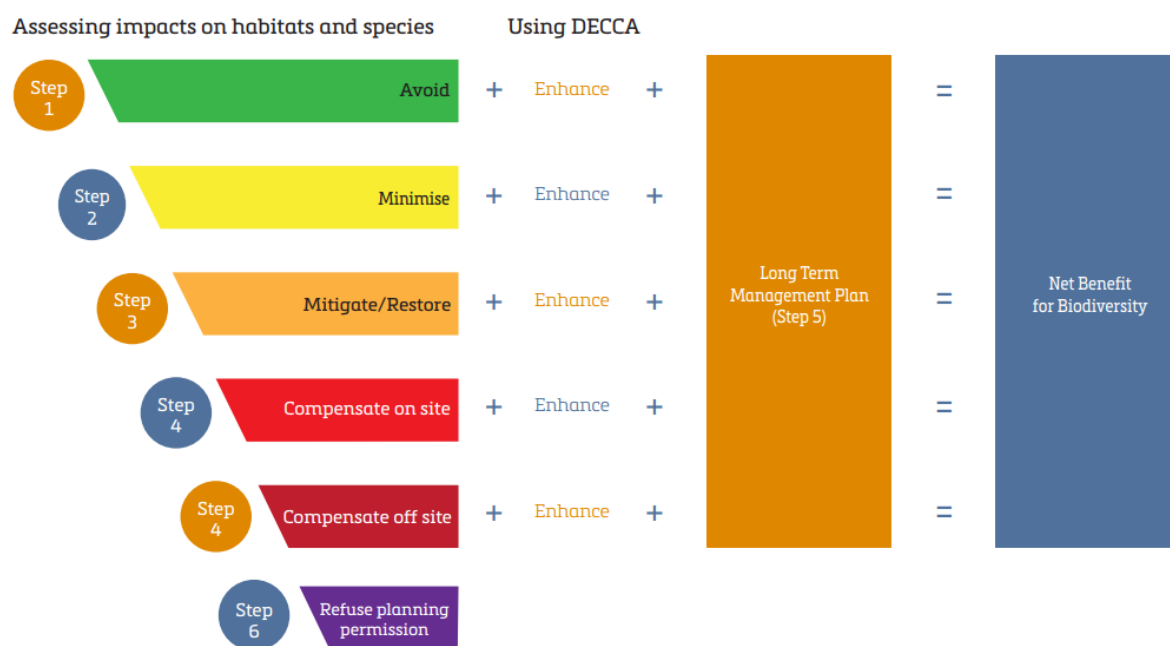


Figure 12 – Planning Policy Wales

4.59 Therefore, the stepwise approach to considering the impacts to green infrastructure within the site are outlined below:

- **Step 1: Avoid** – The proposed additional residential units require internal works only, as for the additional two parking spaces although these will take up a small amount of green space all potential habitats will be avoided. It is not considered to be a material impact.
- **Step 2: Minimise** – The works are minor and there are not considered to be any habitats on site. Albeit, typical mitigation measures will be implemented, including general construction safeguards utilising a low lighting scheme during construction and after to minimise and avoid the disturbance of bats.
- **Step 3: Mitigate / Restore** – The accompanying Biodiversity Enhancement Scheme sets out a number of recommendations to mitigate and restore the habitat that will be lost as a result of the development. These include:
 - 2No. Igloo hedgehog Shelters, to be located in a sheltered area away from prevailing wind, on an elevated surface to prevent water from entering, covered/surrounded by vegetation.
 - 3No. RSPB Burford Bat Boxes, to be located on the side elevations of each block in a high location and away from windows in order to minimise any disturbance. The bat boxes are also located away from any artificial light sources to encourage use by bats.
 - 3No. RSPB Classic Nest Box to be attached securely to existing tree trunks using rust free nails or a strap, between 2-4m above ground level, with entrances facing away from prevailing winds.

4.60 Given the above, we consider that the scheme will follow the stepwise approach to ensure a Net Benefit for Biodiversity and meet the requirement of Chapter 6 of PPW12 accordingly.

5. Conclusion

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.2 In the case of this application, the Development Plan would consist of the Newport Local Development Plan (adopted January 2015). The development is consistent with the LDP as follows:
- The site is located within the Settlement Boundary of Newport, a national growth area which is capable of supporting additional growth on brownfield land;
 - The scheme is considered to optimise the capacity of an existing residential space, which should generally be considered suitable for appropriate development;
 - The scheme will result in no external changes to the existing building, the conversion results in internal changes only;
 - The proposed two additional parking spaces will not materially impact the appearance of the site, given it is a minor increase in footprint and will be contained within the existing parking zone.
 - Parking levels for vehicles and bikes are appropriate to accommodate the parking numbers of a development of this type;
 - The site is well served by Active Travel Routes and public transport; and
 - The proposed biodiversity enhancement measures will improve upon the existing position at the site and greatly offset any impact from the small loss in green space caused by the additional parking spaces.
- 5.3 As such, the scheme is clearly a betterment over the extant permission and should be permitted.
- 5.4 Paragraph 2.17 of PPW states *“In responding to the key principles for the planning system, the creation of sustainable places and in recognition of the need to contribute to the well-being of future generations in Wales through placemaking, development plans and development proposals must seek to deliver development that address the national sustainable placemaking outcomes.”*
- 5.5 Paragraph 2.20 of PPW confirms that a development will not be required to demonstrate they can meet all the national sustainable placemaking outcomes. However, we consider that the development would meet the following national sustainable placemaking outcomes:
- Builds to appropriate development densities;
 - Resilient to Climate changes through the provision of energy efficient new homes;
 - Promotes additional homes to meet society’s needs, including a mix of uses / tenures;
 - Provides local jobs in the construction phase of development which will support the local economy and fostering economic activity;
 - Prioritises the use of previously developed land;
 - Will provide high quality homes which are built to last; and
 - Creates resilient biodiversity and ecosystems.

- 5.6 It is considered that the proposed scheme is in compliance with all relevant local and national planning policies and there are no material considerations which means that a decision should be reached that is not in accordance with the Development Plan.
- 5.7 Therefore, we consider that planning permission can be granted for the conversion and change of use of the existing flats at the application site, together with the increase in parking provision and green infrastructure measures.



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