1660PL1:DAS

Rev 4

Design & Access Statement

for

Proposed Residential Development

At

Kelvedon Street, Newport

MVR – SOLUTIONS –

kennedy james griffiths

KJG

CHARTERED ARCHITECTS • PROJECT MANAGERS

Contents

1.0 Vision & Introduction

The proposed project is located at Kelvedon Street, Newport, NP19 0DW. MVR Solutions have secured an option to purchase the site with a view to providing an affordable housing development in conjunction with a local Housing Association.

The site is currently vacant and a detailed description of the site is included in the site analysis section below. The site is in a sustainable location extremely close to several local amenities including Schools, Public Transport, Shops, and a District Centre.

Further details on the existing site and its context are given in the Context Analysis section below.

MVR have recognised an opportunity to meet an identifiable need and provide affordable housing on a brown field site in a highly sustainable location within an area with a clearly identified need for additional affordable housing.

Planning pre application advice has been obtained (ref: PRELET/ PS/23/0106) and the principle of residential development has been generally accepted, albeit with some issues that are addressed later in this document.

Design Concept Brief

The design concept as set out in a brief prepared by MVR is to:

“Provide appropriate design options to optimise the utility of the site within the parameters of the WDQR 2021 design guidelines. All properties should be designed to achieve EPC-A standard as a minimum and unit types should be 2P1b flats or 3P2B flats which are currently needed to answer the most acute housing need in the Gwent region”.

The design is to be aesthetically pleasing and, where appropriate, complimentary to the existing character of the area as defined in the site context analysis.

All apartments are to be fully compliant with Welsh Government’s Design Quality Requirements (DQRs) including Lifetime Homes, RNIB Standards and Secured by Design compliance to enable the project to be funded by the Social Housing Grant (SHG). In addition to the above the design has to respond to the NCH broader vision as set out below:

Application Description

A scheme has been prepared and a Full Planning application is now submitted following formal Pre Application Consultation. This document has been prepared in support of the application as required by the Town & Country Planning (Development Management Procedure) Order 2009.

This document is set out in accordance with guidance from TAN 12: Design (appendix A1), Design Commission for Wales guidance ‘Design and Access Statements in Wales: Why, What and How’ and Newport City Council’s published guidance documents.

The application is a Full Planning Application for the ‘construction of 30 affordable apartments along with associated parking and external areas’. The development will include a mix of one and two bedroom apartments. The nature and scope of the Proposal is clearly set out on the following drawings and documents which have been included in the application:

Drawing /Document Title	Description
1660PL1-01	Location Plan (A3)
1660PL1-02	Site Analysis drawing (A3)
1660PL1-03	Existing Site Plan (A3)
1660PL1-04 E	Proposed Site Plan (A3)
1660PL1-05 B	Proposed Floor Plans (A3)
1660PL1-06 F	Proposed Elevations (A3)
1660PL1-07 E	Context Elevations (A3)
1660PL1-10B	RPZs (A3)
1660PL1-11	Bin & Bike Store
1660PL1-DAS-Rev3	Design & Access Statement
1660PL1:GIS rev 2	Green Infrastructure Statement
1660PL1:TP	Travel Plan
OCA-JBA-XX-XX-RP-Z-0001-S0-P01- _FCA	Flood Consequence Assessment
1229.01 B	Soft Landscape proposals
R01 A	Landscape Management plan
16.09.24 Kelvedon Street, Newport	Tree Survey
Tree Constraints Plan A3 Kelvedon Street, Newport	Tree Constraints Plan
27.01.25 AIA Kelvedon Street	Arboricultural Impact Assessment
Arboricultural Impact Assessment A3 Kelvedon Street	Plan to support above
SE158-PEA	Preliminary Ecology Assessment
Kelvedon Street Parking Survey Report (24062d1a)	Parking Survey

Existing Use

The site is currently vacant. It was previously a small industrial unit used for commercial printing which ceased operations in the mid 2000’s. The building(s) was demolished between 2008 to 2009. Details of the existing site layout is shown on the submitted drawings and the site is described in detail in the next section.

Previous Planning History

The pre application advice included information on previous planning applications for the site, which has included a number of large residential developments. The most recent application, for 52 apartments was refused; a decision that was upheld at appeal.

2.0 Site and Context Analysis

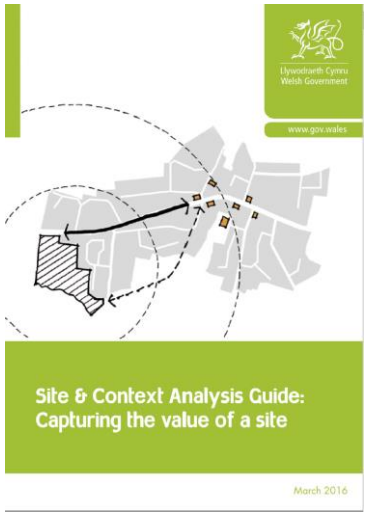
A full understanding of a development site is a crucial part of the design process. To facilitate this understanding a full site and context analysis has been carried out. The analysis as set out below has been based on guidance provided in the Welsh Government publication "*Site & Context Analysis Guide: Capturing the value of a site*".

This document sets out 4 main headings to guide the Site and Context Analysis:

- Culture & Community
- Landscape
- Movement & Infrastructure
- Built Form

These sections are included below with diagrams and photographs as appropriate to further enhance the site analysis and identify the Strengths, Weaknesses, Opportunities and Threats presented by the site.

To assist in the evaluation of the site a Site Context Analysis drawing (1487:PL 02) has been prepared. This is included in the submission and is reproduced below for reference.



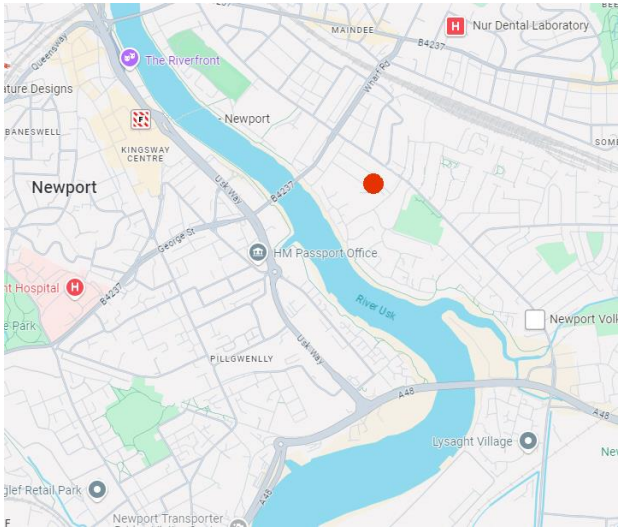
" Design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities."
TAN 12: Design, Welsh Government, para 2.6

Culture & Community

Site Location

The site location is shown on the drawing 1660PL1:01 and the following aerial photograph and map and lies approx. 1km to the Southeast of Newport City Centre. The full site address is:

Kelvedon Street
Newport
Gwent
NP19 0DW



Above: Location map showing the site, Newport City Centre (yellow) is to approx. 1km Northwest
Below: Aerial view of the site (marked in red).

The site is located in the Victoria Ward, to the South East of the George Street Bridge.

The area generally is built up area characterised by residential development, both contemporary and traditional, with a number of commercial units to the South and West

The site is well located to provide plenty of opportunity for employment within reasonable walking and cycling distance. The easy access to public transport and major road links increases the availability of employment to a regional level with limited detriment to the environment.

The site area is approx. 0.25Ha.

Planning Context

The site is within the settlement boundary and the principle of development for residential use has been generally agreed by way Pre-Application advice obtained from Newport City Council in February 2024 (PRELET/ PS/23/0106).

The site is accessible from adopted roads and is not a designated Employment area within the LDP.

The site is not within an Air Quality Management Area (AQMA), nor in an air quality buffer zone.

The site is within the Newport East affordable Housing target area.

Further details of relevant Planning Policies and the design response to these matters are included in later sections of this document, including Section 4: Planning Policy/Consultation.

Surrounding land & Buildings Use

The area is generally residential in nature. The streets to the North and West are generally traditional 2 storey terraced houses. This includes Witham Street and Feering Street.

To the South and East on the opposite side of the Kelvedon Street the use changes with a Pharmacy and Doctors Surgery to the East and a series of small industrial/commercial units to the South and South West.

More details of land use in the local area are shown on the extract from the Analysis Plan included opposite.

Neighbourhood Structure

There is a well-established neighbourhood Structure in the area generally as it is a mature suburb of Newport, albeit an area that is undergoing considerable redevelopment along the riverbank to the North West. The site offers easy pedestrian access to a range of local amenities and employment opportunities for potential residents.

Maindee and St Andrews Primary Schools are both located within an easy 650m walk from the Site with safe footpaths for the entire routes. Lliswerry High Secondary School is just over 2.5km to the SE. The primary Schools are within recommended walking distances as defined by Chartered Institute of Highways and Transportation (CIHT) guidelines 'Providing for Journeys on Foot' and are the local catchment schools for the site.

Corporation Road District Centre is approx. 110m walking distance to the NE of the site along Kelvedon Street. The District Centre has a range of local amenities including convenience stores, health facilities and a Post Office.

There is a doctor's surgery and pharmacy on Kelvedon Street, which is within a level 25m walk from the site.

Newport City shopping Centre is approximately 900m walking distance to the Northwest of the site and provides a range of facilities including retail outlets, a large Supermarket, public transport access, cultural and leisure activities along with a range of employment opportunities.

The site is close to a number of leisure and sports facilities such as Rodney Parade, Dragons Rugby and Newport Squash and Rackets Club to the North.

There are a number of public open spaces in the area including Lysaght's Park approx. 175m to the SE.

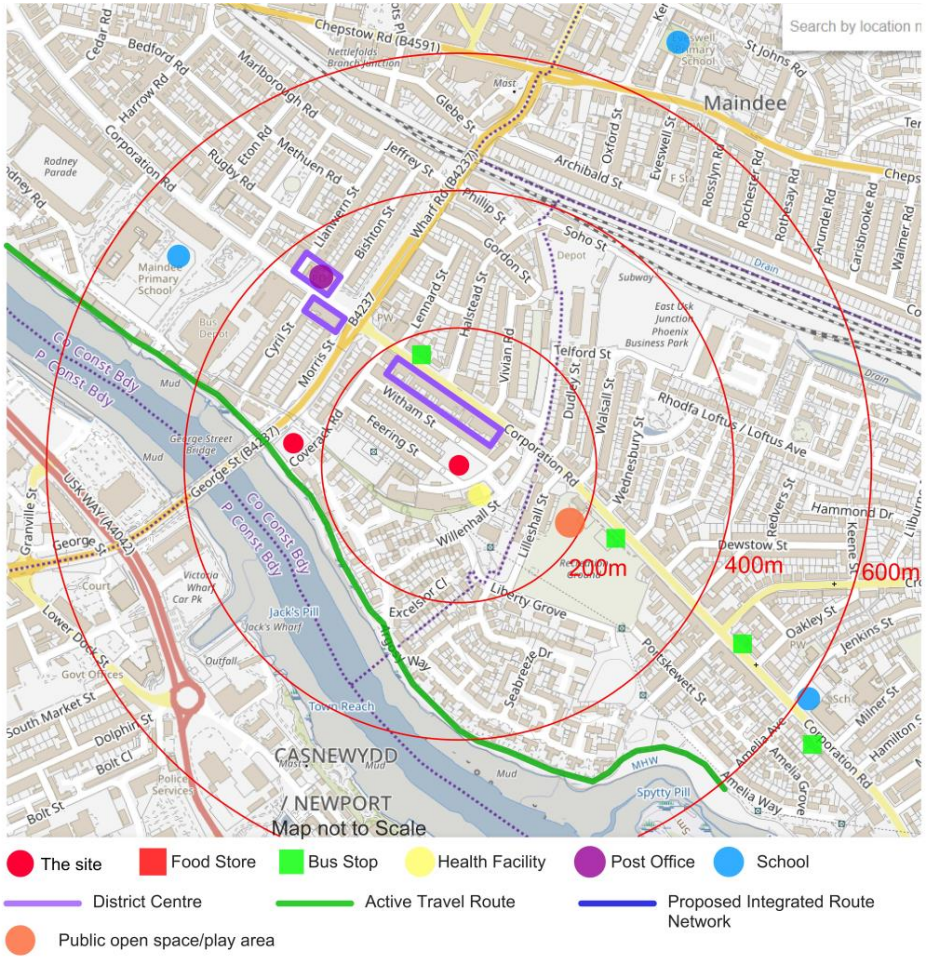
The site is also within 250m of the riverside cycle path on the Eastern bank of the river Usk with National Cycle Route (NCN) 47 on the opposite bank.

As stated above there are a number of commercial activities located close to the site which may offer Employment opportunities. In addition, there are plenty of construction, building and technology companies located within reasonable walking distance of the site. These employment opportunities are also easily accessible by Public Transport (see Movement and Infrastructure below).

As the site is within an existing residential area, with good access to facilities it is not considered that the proposed development will have any negative effect on the surrounding neighbourhood and can only enhance the area.

Residential use of the site is therefore entirely compatible with the existing neighbourhood structure which is a highly sustainable location with good access to facilities and potential employment opportunities in the local and wider areas.

An overview of local facilities and amenities, along with transport connections are shown on the extract from the Site Analysis drawing (1660PL1:02) opposite. Further information is included in Section 4: Access.



Neighborhood Structure
Extract from drawing 1660PL1:02

Consultation & Engagement

An initial proposal was submitted for Non Statutory Pre Application advice in September 2023. Initial advice was received on 2nd November 2023 and a meeting with the Planning Officer was held (online) on 15th November 2023.

Following the meeting a revised scheme was prepared addressing the majority of the concerns raised by the planning Officer and other consultees during the pre-application process.

Details of the design changes following the initial advice and meeting are set out in a planning note prepared at the time. This is included in Appendix 1 of this document.

Further advice was provided by the Planning Officer on 9th February 2024, including some areas where further design development was required.

The currently proposed scheme has responded to the issues raised in the advice received as set out in the Design Appraisal later in this document.

Socio Economic and Market Analysis

The site is ideally located within an existing residential community and close to a wide range of facilities. The site has been identified by the MVR and their HA Partner as being an ideal location to provide high quality affordable housing within the area. There is an identified need for such housing, particularly in areas with such good links and access to employment opportunities.

Given the local demographics it is felt that affordable housing is an appropriate development for the site. It is not anticipated that the proposal would have any adverse effect on the local community.

Unfortunately, the site in its current vacant state has become a hub for anti-social behaviour in the area. Despite increased security and preventative measures this activity is continuing and is having a negative impact on adjacent residents.

The surrounding land use is entirely compatible with the proposed use and the maturity of the neighbourhood will ensure that additional housing can be easily assimilated with no detriment to existing residents. The close proximity of a wide range of amenities and employment opportunities further enhance the credentials of the site for a range of potential tenants.

The potential site value has been assessed along with the anticipated value of completed units and it has been established that a minimum of 35 units are required to make the site viable. Whilst private housing has been considered it is not anticipated that the potential values or demand would justify such a development.

MVR and their HA Partner have identified that the prime demand in the area is for one - bedroom apartments. However, to ensure a more diverse community within the proposed development, it is felt that the inclusion of several two-bedroom apartments is desirable. The proposed design has aimed to respond to this identified mix of apartment types.

Culture & Community Summary	
SWOT	• The site is available and deliverable, • The site is in a residential location in an area with an identified need for housing, • The location is highly sustainable in transport terms and located close to a District Centre and a range of local amenities, • There are employment opportunities with close walking distance of the site, • There are areas of accessible amenity space and recreational facilities within easy walking distance from the site. • The proposed development will prevent the current site from being used for antisocial behaviour.
Design Considerations	• To reflect the residential setting, • To provide a suitable mix of house/apartment sizes to meet HA's stated requirements whilst providing a high-quality environment for residents that adheres to Placemaking principles. • To ensure that the height of the proposed development is commensurate with the setting adjacent existing 2 storey terraced housing.

Landscape

Topography

The site is relatively level with minimal variations in original levels across the site in all directions.

There are a number of spoil heaps of material arising from the demolition of the original commercial units. These will be removed prior to development leaving the site in its original level state.

The site is predominantly taken up original hard standing and cracked concrete/tarmac which has subsequently become vegetated.

A full topographical survey drawing has been included in the application and the site levels present no opportunities or constraints on the design.

The photograph below shows the flat nature of the site when viewed looking NE from Kelvedon Street.

Access Points

The site is bounded by Kelvedon Street, Witham Street and Feering Street, all of which offer the opportunity of pedestrian access to any proposed development. There is an adopted pavement along all of these boundaries.

Vehicular access to the site was originally from both Kelvedon Street to the SE and Feering Street to the SW as can be seen from the Google Earth view from 2006 showing the original commercial premises (opposite).

There are dropped kerbs in these locations and the remains of the original access gates.

Boundaries

The site boundaries are shown on the submitted site survey and existing site plan and can be summarised as:

The NE boundary is formed by the pavement running along the SW side of Witham St. There are 2 storey terraced houses on the opposite side of the road running parallel with the site boundary.

Witham Street is split into 2 sections by a hard standing, including 2 street trees towards the northern corner of the site. The road is effectively a dead end when

approached from either the South (adjacent to the site) of from the North (see photograph on previous page).

The NW boundary if formed by a series of walls and fences to the gable ends and rear gardens of properties on both Witham St and Feering St as can be seen in the photograph above.

The SW boundary is formed by the pavement on the NE side of Feering Street. Opposite the site is a metal fence surrounding a small yard accessed from Feering St.

Like Witham St, Feering St is blocked towards northern end of the site by a hard standing with grassed area and a single street tree (see photograph opposite).

Beyond this area Feering street is 2 storey terraced houses on both sides.

The SE boundary is formed by the back of pavement of Kelvedon Street as shown on the photograph on the previous page. There is an existing access gate and dropped kerb on this boundary as stated earlier.

Generally, the boundaries and immediate neighbours are not a significant restraint on the proposed design other than the need to maintain appropriate separation to avoid overlooking and to ensure that any proposed development is not overbearing.

Blue & Green Infrastructure

The site itself has no significant established green infrastructure as it generally revegetated hard standing.

As the site is bounded on all 3 sides by existing roads and on the fourth by garden walls/gables ends of houses there is no direct connectivity to local green infrastructure and limited scope to create new connections or green corridors.

There are areas of Green infrastructure in the vicinity, most notably the corridor of trees and mature scrub behind the industrial/commercial units opposite the site on Feering Street. However, these are not directly connected to the site nor does the opportunity exist to . As stated above, although close to the site there are no obvious opportunities for a direct connection to create green corridors.

The site itself has no blue infrastructure and is not located within a reasonable distance of any off site blue infrastructure. The River Usk is approx. 200m to the East of the site but the density of the urban development between site and the river prevents any future connections being established.

The site does not present any obvious opportunities to expand green and blue infrastructure connections in the wider area.

There is an opportunity to provide more diverse and appropriate green infrastructure on the site itself as part of the landscaping proposals for any proposed development. See Ecology later in this section.

Flooding:

The entire site lies within Development Advice Map (DAM) Zone C1, which is shown in green on the extract from the online Development Advice Map opposite.

As such, in accordance with TAN 15 a detailed Flood Consequence Assessment (FCA) is submitted as part of this planning application (OCA-JBA-XX-XX-RP-Z-0001-S0-P01-Kelvedon_Road_FCA).

The following is an extract from the FCA:

- 1in200 (0.5%) event plus climate change – 7.37m AOD. The development will need to be flood free in this event.
- 1in1000 (0.1%) event plus climate change – 8.32m AOD. The development will need flood to depths less than 600mm in this event.

As the general levels of the site are approx. 6.8 – 7.0m AOD an element of site raising will be required to ensure that the site is flood free in the 1in1000 (0.1%) event plus climate change.

Any such raising, which may include parking areas in addition to the building itself will be a significant design consideration. The proposed response is set out in the following Design Analysis section of this document.

Ecology

The Preliminary Ecological Assessment of the site (SE158-PEA) does not identify any significant ecological features on the site and has classified it as 'Low Ecological Value'. There are areas of vegetation but these are deemed low value with no capacity for habitat creation and no connectivity to the wider ecological landscape.

There are currently mounds of rubble arising from the demolition of the former commercial premises. These will have to be removed on Health & Safety Grounds which will reduce the existing areas of vegetation on the site. There are areas of revegetation on previously developed land and small areas of mixed scrub around the periphery of the site. None of the species identified are of particular significance and as such the site can be classified as having a relatively low ecological value.

The opportunity exists to improve the biodiversity and green characteristics of the site by use of a sensitive landscape design and biodiverse features.

There are street trees on both Witham St and Feering street that have Root protection Zones that extend into the site as shown on the Tree Protection Plan. These will need to respected in any design proposals.

The proposals for improving Biodiversity at the site are set out in the Green Infrastructure Statement (1660PL1:GIS) included with the Planning application

Landscape Summary	
SWOT	• The site is level with no constraints on potential layouts, • There is easy pedestrian and vehicular access from Kelvedon St and adjacent roads • There are no significant ecological features or areas of Blue of Green infrastructure that impact on any design proposals • There is an opportunity to significantly increase the biodiversity on site. • The site is within Flood Zone C1, although it is in area that benefits from Flood defences • The houses on Feering Street opposite the site have overlooking windows that will need to be respected.
Design Considerations	• The landscaping and topography of the site do not present any issues for a proposed design and offer an opportunity to improve the Biodiversity of the site as part of any proposed design. • To ensure that the design responds to the risk of flooding and meets the requirements of TAN15. • To ensure that the proposed development does not have an adverse impact on the properties on Feering Street.

Microclimate

General assessment

The site is typical of an urban city centre site. There are reasonably significant roads in the vicinity of the site Corporation Road, which may have an impact on the microclimate and amenity of the site. These will need to be considered in any successful design process.

The site is generally open to the East, South and West East which will enable any design to maximise daylight and avoid solar gains.

There are no significant tall buildings in the vicinity of the site that could create wind tunnels or overly shade the site.

Acoustic Environment

The 3 streets surrounding the site are themselves are relatively quiet street and would not pose a significant risk as a noise source. The commercial premises opposite the site are a potential risk but investigations have not revealed any issues locally in terms of excessive noise from these units.

To fully understand any design implications a Noise Assessment has been commissioned from Hunet Acoustics. However, due the presence of a number of homeless people squatting on the site is has not been possible to ;leave monitoring equipment on site overnight. It is anticipated that a Condition will be required for a Noise report to be prepared demonstrating that appropriate noise levels can be achieved in the proposed apartments

The report will set out the measures that would be required to reduce indoor noise levels, if required and these should be adopted in any proposed design. These measures are unlikely to be significant and as such are not an impediment to any design for the site.

Air Quality

The site is not in an identified Air Quality Management Area (AQMA), nor is it adjacent to any identified Air Quality Buffer Zones.

The top (northern) end of Kelvedon Street and Feering steer are adjacent to a buffer zone, although as the roads does not connect to the site from the North this is not a significant issue.

The site is accessible from the A48 to the South via Corporation Road without passing through any AQMA Buffer Zones.

The extract from Newport CC live maps shows the AQMA (in brown) and the buffer zone (in yellow).

The Pre application advice refers to the Air Quality SPG and the step-by-step approach to carrying out an initial AQA.

As the site is a major development under Planning Policy Wales (over 10 units) scenario 4 applies and as such a simple AQA is required.

An assessment of potential vehicle movements is being carried out to inform a simple assessment. The following measures can be adopted within the proposed design to mitigate any impact on air quality:

- The inclusion of infrastructure for electric charging points within any proposed parking area. Either linked directly to apartments or from a site wide supply and accessible via a charging app (most appropriate).
- The production of a Travel Plan to advise and inform operators and residents of the methods available to reduce reliance on the private car for transport.
- The provision of a detailed guide as part of the Travel plan listing all of the public transport options available in close proximity to the site.
- The provision on site of safe and secure cycle storage facilities to encourage occupants to use cycles as an alternative to the car.
- Reduce available visitor parking at the development to encourage visitors to use public transport, which is readily available in the area.
- Ensure suitable pedestrian connectivity is provided to the local footpath network.

As all of these measures listed can easily be accommodated within the design and in most cases are part of the brief it is believed that a detailed AQA will not be required.

Microclimate Summary	
SWOT	• Air Quality at the site is not an issue, although the site is close to an Air Quality Buffer Zone. • The site is accessible from the South without having to travel through and Air Quality Management Area (AQMA) or Air quality buffer zone. • Noise is not considered an issue that could materially affect any proposed design
Design Considerations	• To ensure that any proposed method of construction can provide suitable internal ambient noise levels, • To ensure that layouts are arranged to enable maximum use of solar PV panels to improve the energy efficiency of the dwellings. • To ensure that the proposed design minimises any impact on air quality. • To ensure that Electric Vehicle charging points (infrastructure) are included in any design.

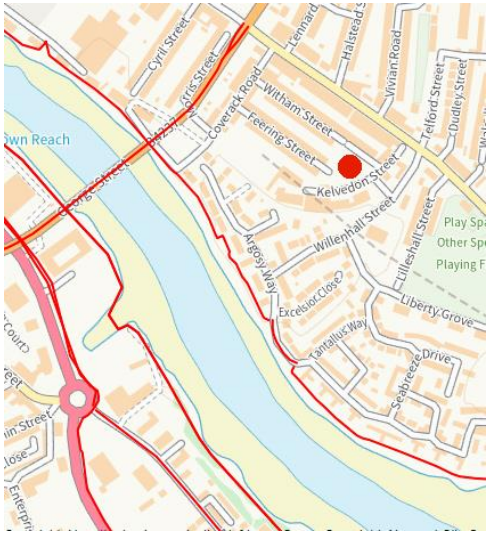
Movement & Infrastructure

Road Hierarchy & Access

The site is in a sustainable location and is located close to many local amenities and facilities as well being well connected to the public transport network (see Neighbourhood Structure).

The site is located on Kelvedon Street, which, via Corporation Road, connects to the wider road network in Newport. Corporation Road links directly with Chepstow Road and the Newport Bridge which connects directly with the M4 to the North (Caerleon Interchange) and Newport Town Centre to the West.

Although well connected Kelvedon Street and the site itself is a relatively quiet road that offers safe access for pedestrians to the walking routes along the river to the West via Willenhall Street



The site has wide pavements on all sides that connect to the wider pavement networks and provide access to the local amenities, Public Transport connections and the City Centre.

There are existing Active Travel routes, including dedicated cycle lanes and bus routes from Corporation Road to the city centre, and beyond into Newport's commercial sectors.

There is also an existing Active Travel Route along the eastern bank of the River Usk within 200m of the site.

The extract from Newport Maps shows active travel features and designated routes. This is available on the following link:

https://my.newport.gov.uk/

Public Transport

There are a variety of bus stops and modes of public transport within the site's vicinity. There are bus stops within a 200m and Newport Train station is less than 1.5km walking distance from the site.

For a detailed assessment see the parking sustainability calculations in the following section.

The buses also provide an easy connection to the main bus station and train station within Newport City Centre, which provides access to regional and national connections.

The site is well served by Public Transport that provides regular connections to the City Centre and nearby amenities.

Cycling Infrastructure

Cycling in the immediate vicinity of the site is accommodated on-carriageway. There are existing cycleways on the east side of the river Usk close to the site.

There are number of dedicated cycle paths on the western side of the river.

The site is reasonably accessible by cycle and the accessibility will improve over time as the Council rolls out its planned active Travel Route network.

Utilities & Infrastructure

Surveys and enquiries have shown that all major services are available at the site with sufficient capacities to cater for the proposed size of development.

The Dwr Cymru/Welsh Water drawings included in the application show that water and drainage connections are available immediately adjacent to the site.

Telecoms connections are available in the adjacent footpaths ensuring that suitable digital connectivity can be provided to the site. BT superfast broadband is readily available.

A Sustainable Drainage scheme is being developed and this will be included in the upcoming Planning application.

It can be seen that there is suitable drainage, water, telecoms and electric services within close proximity to the site and the capacity exists to serve the proposed development.

Parking requirements for proposed development

Car parking provision for the proposed development is required in accordance with Newport City Council Parking Standards, March 2015, which is supplementary planning guidance of the Local Planning Authority.

The parking standards also refer to the use of Travel Plans and the sustainability of new developments.

The parking standards quotes paragraph 8.4.2 of Planning Policy Wales which states: '*Car parking provision is a major influence on the choice of means of transport and the pattern of development. Local authorities should ensure that new developments provide lower levels of parking than have been generally achieved in the past. Minimum parking standards are no longer appropriate.'*

The document also notes that: *'These parking standards will inform observations made by the Highway Authority at Newport City Council on applications received for Planning Permission.'*

The adopted parking standards introduced a system of zones for parking and the standards 'lay out six such zones, each with differing designated levels of parking requirement for development management purposes.'

It is considered that the proposed development site is located in a Zone 4 urban location as per the definition detailed in the parking standards.

Car parking provision for the proposed development will need be provided in accordance with Newport's adopted maximum parking standards as set out below.

For Residential new build and Conversions in Zones 2-6, the Parking Standards require 1 space per bedroom with a maximum of 3 for each dwelling, with 1 visitors' space for every 5 dwellings.

However, the Car Parking Standards SPG includes sustainability criteria in Appendix 5 that allows the Maximum parking levels to be reduced if certain criteria are met. This site meets many of the stated criteria as set out below:

Sustainability calculation

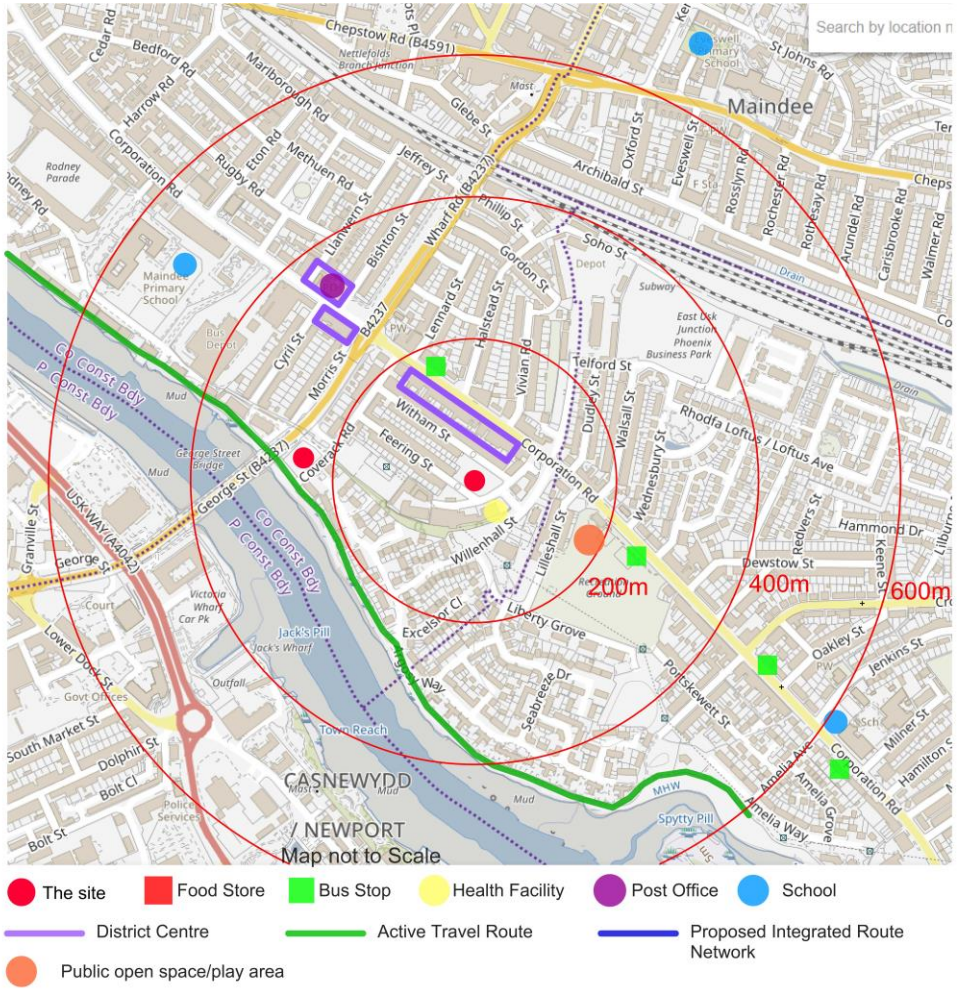
The following section sets out the process by which the SPG's Sustainability calculator has been used to generate sustainability points that can reduce the maximum number of car parking spaces required per house type.

The table below lists a series of local amenities and gives the true walking distance from the site. The table also includes an assessment of the Sustainability points available against each category.

All distances have been measured along accessible pavements and not 'as the crow flies' to give a true walking distance. Distances have been measured using Google Maps and calibrated against a CAD based OS sheet to ensure accuracy:

Facility	Distance *	Score	Notes
Local Facilities			
Post Office Corporation Road	452m	3pts	Healthcare facility (Doctors) within 200m taken with District Centre scores 3 points
Pharmacist (Well Pharmacy)	25m		
Doctors (Rugby Surgery)	25m		
St Andrew's Primary School	635m		
Maindee Primary School	665mm		
District Centre			
Corporation Road District Centre	110m	6 pts	Double points
Public Transport			
Corporation Road (Eastbound)	230m	3pts	Bus stop within 300m scores 3pts
Corporation Road (Westbound)	268m		
Cycle Route			
Active Travel route connected to Route 88	250m	0pts	
Frequency of Public Transport			
Bus stop within 800m which operates between 7am and 7pm	20 mins	1pt	See table below for bus frequency
TOTAL POINTS		13	

The map in the opposite shows the facilities in the table above. The map has radial travel distance marked and includes the proposed Integrated Route Network.



Public Transport frequency:

The following bus services call at the stops identified above:

Route Number	Route	Frequency
42	Newport - Spytty Retail Park	hourly between 7.50 and 19.04
	Spytty Retail Park - Newport	hourly between 7.50 and 18.55
43	Spytty Retail Park - Newport	hourly between 07.44 and 18.25
	Spytty Retail Park - Newport	hourly between 07.44 and 18.25
5	City Centre - Gwent Europark	Various between 05.14 and 21.22
	City Centre - Gwent Europark	Various between 05.14 and 21.22
9A	Newport - Spytty Retail Park	hourly between 19.00-21.36
9C	Newport - Spytty Retail Park	hourly between 19.00-21.36

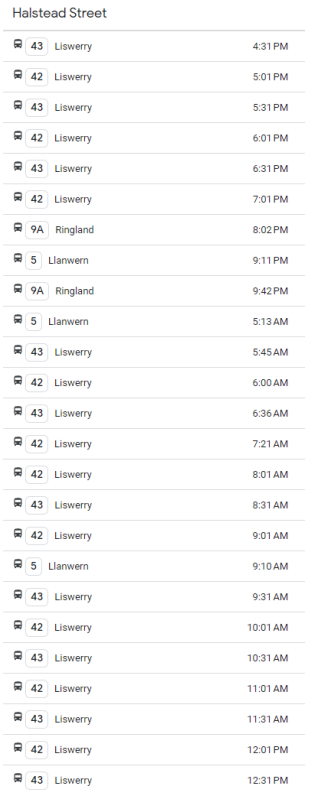
The opposite is an extract from the Google maps departure board for one of the bus stops on Corporation Road (Halstead Street) showing a frequency of approx. 20mins on a Friday PM. The frequency is higher Monday to Friday.

From the above it can be seen that the combined frequency of service to Newport and other major destinations is approximately every 20 minutes or less during the required hours. A more detailed examination may show a higher frequency, but 20 minutes is sufficient to score a sustainability point.

The sustainability score of 13 is therefore confirmed. This allows a reduction of 2 spaces per unit, with the proviso that the number does not drop below 1 space per unit.

To benefit from this reduction requires a Travel Plan and possibly a Transport Statement. These documents will be included

The impact on the maximum parking spaces by apartment and for any proposed development is shown in the Access Statement later in this document:



Movement & Infrastructure Summary	
SWOT	• The location is highly sustainable in transport terms and located close to a District Centre and a range of local amenities, • There is good connectivity for both pedestrians and vehicles, • There is easy pedestrian access to Public Transport options within easy walking distance of the site. • Parking is readily available off site in the vicinity of the site.
Design Considerations	• To ensure the site is connected to the existing pedestrian and vehicular infrastructure,

Built Form

Urban Form

The urban form of the immediate area is very much residential in character for the most part. There are some commercial activities to the South West on Kelvedon Street but residential is the primary form.

The road structure and layout is well defined and the site is surrounded by existing roads on three sides, and as such is clearly defined.

The character of the houses on Witham Street and Feering Street are typically City Centre urban consisting of long terraces of 2 storey houses with all sitting directly on the pavement as shown below in the Streetview images of both roads looking South towards the site.

Building Scale, heights and Density

All of the surrounding residential Streets are 2 storey terraces. The nearby commercial units are also of modest height, albeit some are taller than the neighbouring houses.

Given the predominance of smaller terraced houses the residential density of the immediate area is high.

A development of 2-3 storeys would be appropriate in this location as long as the proposed building is not overbearing on the existing houses in Witham Street of Feering Street..

Built Form Summary	
SWOT	• The urban form is well established and supports residential development, • There are no specific threats or weaknesses as a result of the surrounding urban form and density. • The building heights are generally 2 storey requiring sensitive massing for an development over 2 storeys.
Design Considerations	• To provide a suitable density of development to meet the requirements of the HA, whilst respecting the development densities in the area generally. • To respect the existing urban form and streetscape • To ensure that the massing of any proposal is not overbearing to adjacent residents..

Strengths, Weaknesses, Opportunities and Threats

Strengths

- The site is available and deliverable,
- The site is in a residential location in an area with an identified need for affordable housing,
- The location is highly sustainable in transport terms and located close to a District Centre and a range of local amenities,
- The site is not overshadowed and allows windows to be located on most elevations if overlooking distances are respected,
- There are sufficient statutory service connections readily available in close proximity to the site.

Weaknesses

- There are no significant weaknesses to the site although there is potential for noise from adjacent commercial units to be an issue,

Opportunities

The site provides an opportunity to:

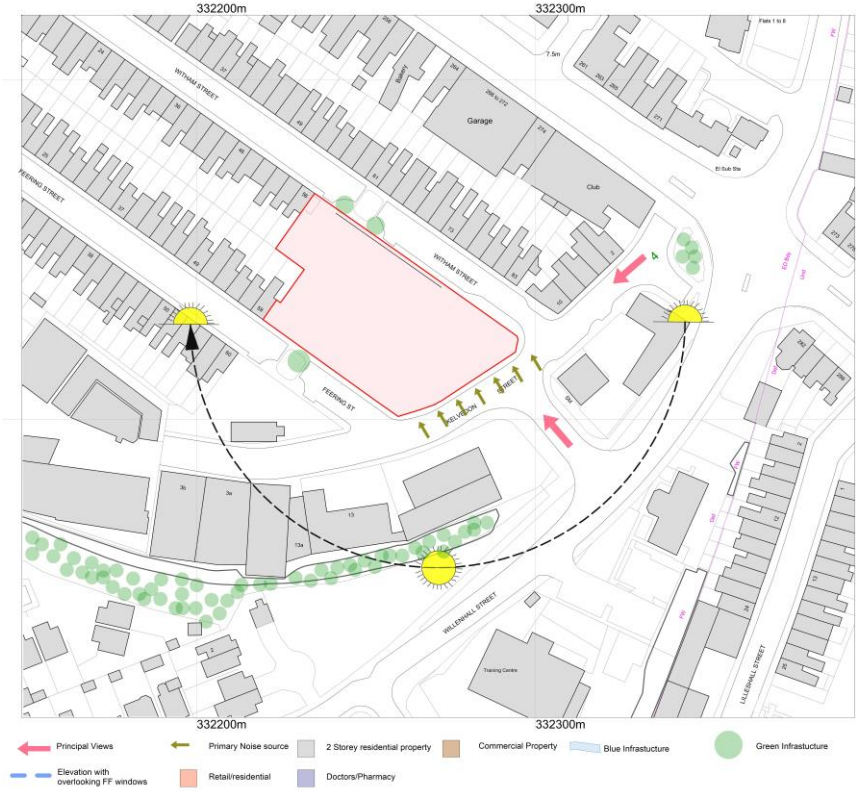
- address an identified need for affordable housing,
- provide high quality accommodation in a sustainable location with easy access to the wider region and employment opportunities.
- ensure that safe access for all is provided to the proposed building(s).
- provide a development that is sustainable in its construction and ongoing use.
- provide a development that is sensitive to its wider environment and does not adversely affect neighbouring occupiers.
- To significantly increase the Biodiversity on the site by inclusion of landscaping features.
- To reduce the extent of surface water run off from the site by the inclusion of an appropriate SUDs drainage scheme.

Threats

- No significant threats identified.

Design Brief:

- The brief agreed between the Developer and the HA is to:
- Provide high quality accommodation fully complaint with Welsh Design Quality Requirements (DQRs) and Lifetime Homes.
- Provide a development that achieves the client's operational and economic brief.
- Ensure that safe access for all is provided to the proposed building.
- Provide a development that is sustainable in its construction and ongoing use.
- Provide a development that is sensitive to its wider environment and does not adversely affect neighbouring occupiers.
- Provide a development that makes a significant architectural contribution to the area.



3.0 Design Analysis

The final design for the Proposal, shown on the submitted plans, has been developed following the detailed appraisal of the site set out above. The evolution of the design, and a description of how it relates to the character and context of its surroundings, is set out below.

The five objectives of good design are a set of principle considerations, as outlined in Technical Advice Note 12, to ensure developments effectively respond to local context so that they assimilate into the locality and are functional for their intended user. The Five Objectives of Good Design are Access, Movement, Character, Environmental Sustainability and Community Safety – each of which will be dealt with separately in turn below. The Welsh Governments "Design and Access Statements in Wales" (June 2017) has been carefully considered in this section.

Design Brief

The design of the buildings and the site layout have been arrived at following careful consideration of the Client's housing and management brief, the constraints and opportunities offered by the site analysis and the results of previous consultations undertaken.

The design of the individual dwellings and the overall site layout also complies with Secured by Design, the Welsh Design Quality Requirements (DQR's) and Lifetime Homes.

The relationship between the dwellings and the external areas together with the need to ensure that wherever possible a level access is provided has determined the overall site layout.

The following design principles have been established to inform and guide the design process:

- Respond to the context and Character of the site,
- Provide internal and external layouts that are fully DQR compliant to ensure the proposed dwellings are suitable for affordable housing,
- To provide modern, efficient, well insulated accommodation,
- To provide a quality design that enhances the character of the area,
- To provide a site layout that is safe, secure and improves the environment for all,
- Provide accommodation that meets the requirements of Building Regulations Part E, internal passage of Sound, to ensure the amenities of future residents,
- To provide a balance of unit types to ensure a diverse mix of occupants and creation of a sense of community within the development,
- To minimise the amount of maintenance required by the HA.

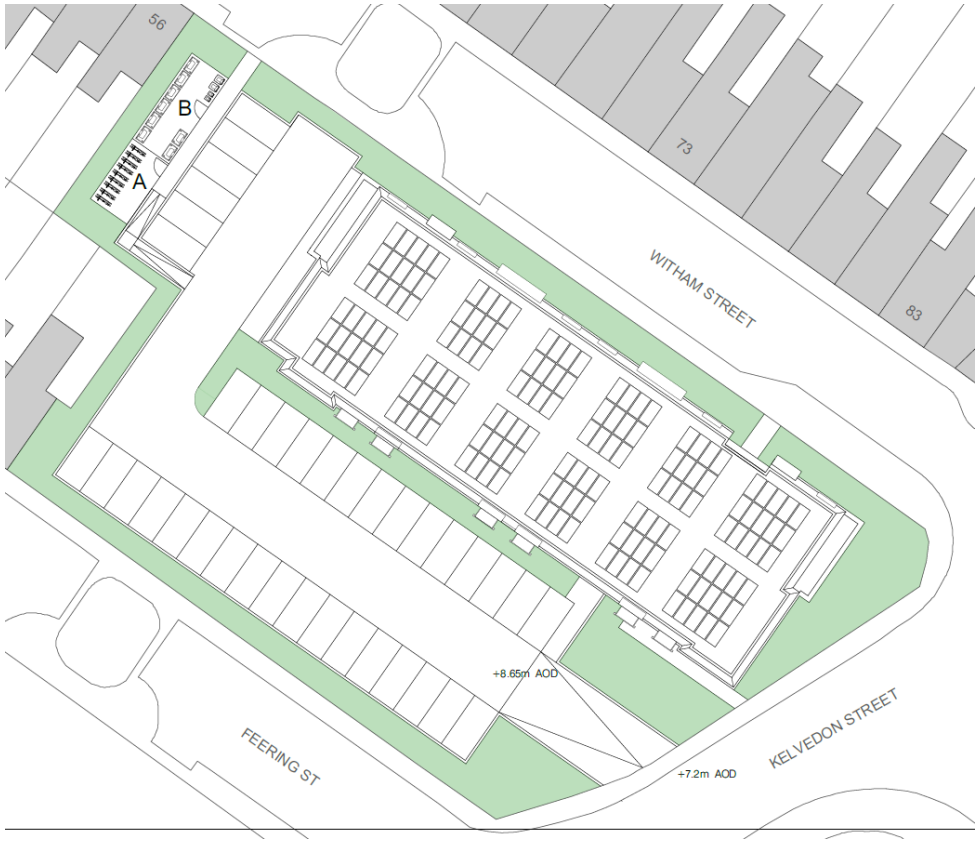
The following sections give more detail on how the proposed design has developed and meet the 5 Objectives of Good Design referred to in TAN 12: Design.

Design Development/Evaluation

In addition to responding to the constraints and opportunities identified in the site analysis due regard was taken of the pre application provided by the Local Authority Planning Department.

An scheme was submitted in September 2023 for 35 apartments and initial advice was received in November 2023 along with a follow up meeting.

The site layout and elevations initially submitted are shown below:



Elevation to Witham Street (North East Facing)

Elevation Parking (South West Facing)

This scheme had a 3 storey block of apartments along the NE part of the site facing Witham Street intending to complete the terrace on the SW side of the street.

Whilst the pre app advice accepted the principle of the development, including the general scale and density, it did raise concerns regarding the density, the location of the building on the site and the massing of the building.

These matters were addressed in a second submission which resulted in updated Pre plication advice. A detailed overview of the changes in the second submission and how it responded to the initial advice is included in Appendix 1 of this document.

The drawings now included in the Planning application are a further refinement of the above submission, following further comments from the planning officer, and are described in detail in the following sections:

Access

Refer to section 5: Access Statement of this document and the site and building layout sections below.

Movement

Refer to section 5: Access Statement of this document for details of movement to and from the site/building.

Character

Use

The proposal is to provide 100% affordable housing, owned and operated by an RSL, on an existing previously developed site in Newport. The proposed design has sought to maximise the potential of the site without overdeveloping it and is set out on the submitted drawings.

The site is in a generally residential area and pre application advice received has indicated that the proposed use is acceptable in principle subject to successful resolution of some matters raised. These are generally addressed in this and the following Planning Policy section.

The proposed site plan is shown below and is included in the application as drawing 1660PL1:04.

Amount

The scheme provides for 30 dwellings with a mix of two types. This is a reduction of 5 units from the original pre application submission:

- 22 number 1 bedroom 2 person apartments (47.9 m^2)
- 8 number 2 bedroom 3 person apartments (59.6m^2)

The overall area of the site is 2.523m^2 (0.25Ha, 0.62acres). This gives an overall site density of 120 units per hectare (48 per acre), which is in excess of the minimum density required by Policy H3 (Housing mix and Density) of the LDP which is 30 dwellings per Ha.

The inherently sustainable nature of the site in terms of access to public transport, local facilities and potential employment would encourage a higher density of development to take best advantage of the opportunities presented within the local area.

The proximity to local amenities and the City Centre together with the availability of public open space makes the local ideal for a denser development. In addition, the use of Brownfield (previously developed) land for high density housing is an appropriate use of resources.

The apartment sizes are in line with established norms and are in full compliance with Welsh Design Quality Requirements (DQRs) Beautiful Homes and Spaces 2021, and Lifetime Homes, in terms of overall size and internal layouts.

The development is proposed to be 100% affordable with all of the proposed residential units to be secured as affordable in perpetuity. The HA's Housing department have carefully considered the housing mix to satisfy the demand in their housing register, and also looking at possible future needs.

A range of tenures may be explored by the HA to try and increase to diversity of prospective tenants.

The apartment sizes are in accordance with the Newport City Council New Dwellings SPG as shown on the extract below which sets out the minimum space standards for Common Access apartments (page 25).

In terms of amount, the number of dwellings proposed across the site is largely compatible with the surrounding area and the scheme sits comfortably within its residential context. Consequently, it would not have a negative impact on the existing built form.

	Flat type			
Beds/bedrooms	*Studio*	*Converted*	*New*	
			Common Access[2]	Walk up[3]
1	32	45	46	50
2	n/a	58	59	65
3	n/a	74	84	90
4	n/a	86	93	99

Site Layout

The shape and configuration of the site along with the detailed site analysis has informed site layout along with the comments of Planning Officers in pre app consultations for this project.

The main drivers on the site layout are:

- To provide a quality environment for residents,
- To ensure no excessive overlooking to or from adjacent properties, particularly those on Witham Street directly facing the site,
- To ensure that suitable vehicular access is provided for residents and delivery and waste vehicles, whilst ensuring that the car parking area is generally flood free in the 1in 200 (0.5%) event plus climate change,
- To ensure a suitable SUDS drainage scheme can be deigned,
- To ensure biodiversity of the site can be improved from the current situation,
- To create a cohesive streetscape that connects to the adjacent terraced housing on Feering Street whilst still maintaining a positive aspect to Witham Street.

The site has been laid out to meet the above requirements and respond to the comments of the Planning Officer in pre app discussions.

The block has been located on the SW side of the site running parallel with the terrace on Feering Street, although set slightly back from the building line to provide an area of landscaping in front of the block and to minimise the impact on the Root Protection Zone (RPZ) of the existing street tree.

There are pedestrian accesses to the main entrance and the fire escape from Witham Street, which has a suitable pavement along the site frontage.

These access points provide level access to the building via doors at pavement level. Inside the building are stairs, and a lift, that provide access to the general Ground Floor which is approx. 900mm above pavement level to ensure that the building is flood free in the relevant events as required by TAN15.

There is also the potential to access the site from Feering Street using the on site footpaths connecting the building to the cycle store and bin store in the NE corner of the site adjacent to the dedicated amenity space.

This secondary access is at the buildings Ground floor level with a series of ramps taking the path down to pavement level and the site boundary of Feering Street.

Whilst the vehicular ramp from Kelvedon Street has been designed to be a shared vehicle and pedestrian space, with vehicles slowed down by the shape of the ramp, it is not anticipated that it will get significant pedestrian usage.

Access from on site parking spaces is via a shared space and a dedicated footpath in accordance with manual for Streets principles.

The building itself is aligned NW/SE to align with Feering Street boundary to respect the line of terraced housing, addressing one of the concerns on the originally submitted scheme

This alignment enables a blank gable elevation to present to the gable end of the terrace to the NW. The only openings will be obscure glazed louvres at the end of the internal corridor that will act as Automatic opening smoke vents in the event of a fire. These will provide light to the corridor but will not allow views out into the rear gardens of Feering St.

The opposite gable faces the junction of Feering St and Kelvedon St and is not subject to any overlooking issues. This gable is staggered to accommodate the mix of apartments and the inclusion of a plant room at Ground floor.

The combination of the stagger and the presence of windows in this gable end provides an active frontage and visual interest as the building turns the corner.

The site boundary will have a low level hoop top fence to provide separation between the public footpaths and the private space, without making the site visually isolated from its surroundings. Security will be natural, ie the boundaries are all overlooked by a number of apartments, providing a natural deterrent.

Vehicular access to the site is from Kelvedon Street from the SE and utilising wherever possible the existing crossover. The existing pavement will be upgraded to provide tactile paving to denote the new vehicle crossover.

The new vehicle entrance gives access to a ramp that take the road up to the car parking level required to avoid flooding as set out elsewhere.

The ramp has been curved to soften its impact when viewed from the approach from Willenhall Street. The ramp will have kerbs but no other guarding as the ground will slope up with it to the upper parking level. This will again reduce its visual impact.

The vehicular entrance gives access to the proposed car park for 30 cars, which will include a minimum of 10% electric vehicle charging points. The HA's policy may require this ratio to increase significantly.

The raised parking area will be bounded by a low wall with low level hoop top railings on top to provide visual security, although the car park is overlooked by a number of apartments to provide natural security in line with Secured by Design (SbD) requirements. The low walls will confine cars to the car park in the event of a catastrophic flood as per the submitted FCA.

The parking numbers are in line with the maximum permitted by the relevant SPG and are deemed appropriate for the expected usage at the site as set out in the previous section and the Access Statement.

All parking spaces are a minimum of 2.4m x 4.8m in line with the SPG and are located a min of 2m away from the building to comply with Lifetime Homes. The parking area is intended to be a shared space, in line with Manual for Streets.

2 of the spaces sit either side of a walkway at parking level which enables the spaces to meet the requirements for disabled parking bays.

The Transport Statement and Travel Plan provide support for the proposed number of parking spaces, which is deemed appropriate for the location and tenure of the proposed apartments.

Cycle storage is provided on site for 18 cycles in a dedicated covered and secure cycle store as described in the Access Statement at the end of this document. The store will also benefit from a sedum roof to assist the SUDs strategy for the site.

The cycle storage is easily accessible from Feering Street and Witham Street via the raised road closure areas adjacent to the street trees and is set at pavement level. Ramps from this level on the internal site footpaths connect to the building entrances.

The cycle parking is adjacent to the dedicated external amenity area, which has a combination of soft and hard landscaped areas with seats/benches to facilitate residents' enjoyment of the space (see below).

An additional 2 short term cycle spaces for visitors are provided adjacent to the main entrance off Feering Street .Cycle parking is in excess of the requirements of the relevant SPG.

Also accessible from the external pavement level is the dedicated bin store. This has been designed to accommodate the required number of bins as set out in the Waste SPG. There is safe access for residents to the bin store and also for waste collection operatives (refer to Waste section below for details).

Areas of rain gardens and areas for SUDs drainage are provided around the site. In total 580m^2 of the overall site (23.0%) will be biodiversity areas. The dedicated amenity space accounts for a further 196m^2 (8%) of the site area.

A full landscaping scheme has been prepared by a suitably qualified landscape architect (Messrs DLP) as suggested in the Pre application advice. This landscaping scheme has been included in the application and gives details on the proposed species along with detailed planting and maintenance requirements.

The overall all area of diverse and maintained landscaping is more than the existing situation and the mix of plant types will be increased to ensure that there is an uplift in biodiversity at the site as a result of the development. This will be enhanced by the addition of bat boxes and bird nesting boxes on the building as stated in the GIS and shown on the elevations.

All of the apartments have private amenity space, either terraces on the Ground Floor or balconies on the upper floors. These are described in the apartment layout section and are compliant with the New Homes SPG.

Communal Amenity Space

Communal Amenity space on site is limited due to the requirement to provide parking for the proposed number of apartments. Although the parking numbers have been

reduced below the maximum permitted there is still limited space on site for communal amenity space.

Also Housing Associations and their tenants are not keen on large areas of this space as it increases the maintenance costs that have to be passed on to tenants. Such space can also be misused by residents leading to tensions within the site community.

Given that there is easily accessible public open space, including formal play and sports areas within 200m of the site in Lysaghts Park and 365m in Wednesbury St, the amount of formal on-site amenity space has been limited to allow for increased areas of general landscaping and tree planting to enhance biodiversity.

An area of 398m^2 of formal communal amenity space has been allocated. This includes grassed areas along with a paving and a seating area with benches and tables. This equates to approx. 5.8m^2 per potential occupant.

This amenity space is at external pavement level and is connected to the building via dedicated footpaths with accessible ramps. A hard landscaping area is provided with seats and benches and is surrounded by a suitable soft landscaped area

Whilst below the level stated in the New Homes SPG, it is felt that this area, along with the public open pace within easy reach of the site and the benefits of additional high quality on site landscaping, is an appropriate provision.

The New Homes SPG (Table 12 opposite) states that communal amenity space for should be 11m^2 per person (68 occupants) or 748m^2, which is 30% of the overall site area, which would not be viable if the required level of on site parking is provided.

The dedicated amenity area is below this requirement but provides approx. 5.8m^2 per occupant.

No of occupants	Square metres per occupant
1-20	15.00
21-40	14.00
41-60	13.00
61-80	12.00
81-100	11.00
100+	10.00

Figure 12: Desired standards for communal amenity space

However, the overall area of landscaping and dedicated amenity space is 703m^2, which equates to 11.41m^2 per occupant (68). This is in excess of the SPG requirement.

Whilst not designated as formal communal amenity space the 580m^2 of landscaping on site could be classed as informal communal amenity space. It certainly contributes to the amenity of the site. These areas will be subject to s detailed landscaping scheme by a suitably qualified landscape architect and will incorporate SUDs features and biodiversity enhancements. Large proportions will be accessible for casual use and may include additional seating areas.

The Outdoor Play Space SPG has been referenced as a relevant Guidance document. We have considered this document and would make the following comments:

- There are a range of formal and semi formal play spaces is close proximity to the site, specifically at Lysaghts Park on Corporation Road and Wednesbury Street.
- Lysaghts Park includes a LAP (green field/football pitch), a LEAP (formal play space with equipment) and a NEAP (basketball area).
- Wednesbury Road Park includes a pleasant external area with high quality landscaping and seating areas.
- In addition Newport athletic club is approx. 1km to the North East of the site providing opportunities for more formal recreation and sports.

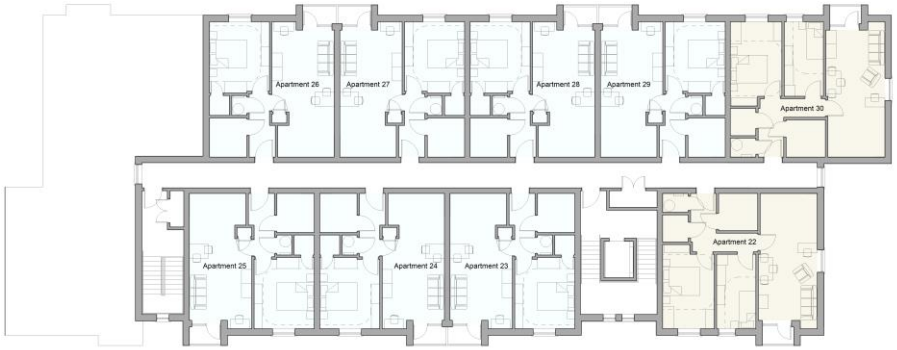
It is hoped that the availability of easily accessible open space will be considered as a factor to permit the reduction in on site amenity space. Given land costs and the requirement to achieve the a reasonable site density, the viability of the scheme would be compromised if additional onsite amenity space is required.

The site layout has been carefully considered to ensure there are no issues of overlooking either to, or from, the site and the proposals will have no adverse impact on neighbouring properties.

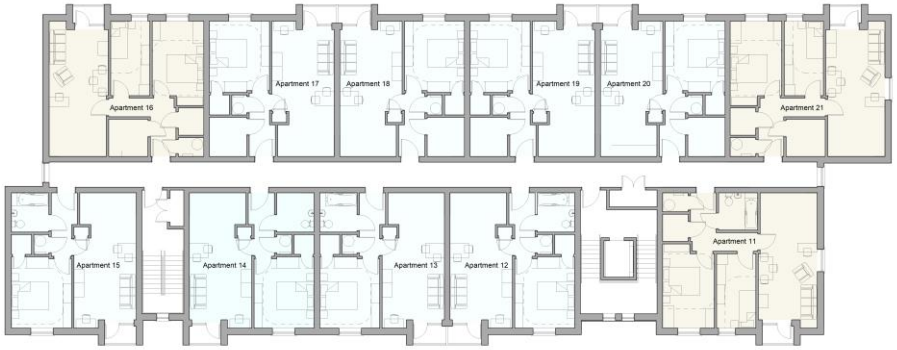
The Local Designing Out Crime Officer has been consulted and an application for Secured by Design certification has been made as required by Wales DQRs. The results of the consultation will be included in the full planning application.

Apartment Layouts

Detailed layouts are shown below and on the submitted floor plans 1660PL1:05 and the extracts below:



Second Floor Plan



First Floor Plan

As described in the site layout section above the main pedestrian entrance is off Feering Street via a footpath across the landscaped front garden. Glazed entrance doors lead to a lobby which includes the main staircase and a lift.

The entrance is lower than the ground floor so a flight of stairs rises to the ground floor. The lift has doors front and back to allow for this change in level.

At the upper (GF) level the lobby leads to a corridor than runs the length of the building and provides access to the 10 apartments on the ground floor. To the left of the entrance on the front elevation are 4 one bed apartments, to the right is a two bed apartment.

On the car park (rear) elevation are 2 one bed apartments and 2 two apartments, one at either end of the corridor.

Either end of the corridor, that runs the full length of the plan are glazed louvres that at as Automatic Smoke vents in the event of a fire.

There is a secondary staircase towards the Northwestern end of the building which acts as a means of escape discharging to the front of the building.

On the NE side of the corridor there is an access to the car park and a large services room that will house incoming services, meters and the sprinkler tank.

The two sides of the corridor have been 'slid' to provide a stepped gable at both ends. This ads visual interest and an active frontage to the SE gable whilst also moving the Northern corner of the building away from the boundary to the adjacent house on Feering Street.

The main staircase provides access to the 2 upper floors, which stack vertically to the on both sides of the corridor with the exception that the Ground Floor plant room and car park access is replaced by an additional one bed apartment.

The plan layout of the apartments is consistent throughout the building with all one bed apartments the same, as are the two bed units.

All apartments have full height glazed doors with balcony to the living/kitchen area to increase the available daylight and provide private amenity space. The full height door also increases the area of natural ventilation should it be needed in warm weather.

The balconies are sized to be in accordance with the new homes SPG providing over 1.5m^2 area.

Suitable storage is provided in all apartments over and above the space required for building services.

The apartments are all electric using an electric hot water cylinder and wall mounted electric heaters. Each apartment will have a dedicated supply of solar power supply from the PV panels located on the roof. Consideration is also being given to providing battery storage to increase the energy efficiency of the apartments.

Given that the apartments benefit from solar power and will be designed to be air tight and well insulated, running costs and carbon emissions should be low. The apartments will all achieve an A rating on the SAP Assessment scheme.

The fabric of the building and the windows in particular, have been designed to ensure that any impact of external noise sources can be mitigated for residents. The Acoustic report submitted with the application includes measures to mitigate potential noise and these will be implemented in the design.

Given that the apartments benefit from solar power and will be designed to be air tight and well insulated, running costs and carbon emissions should be low. The apartments will all achieve an A rating on the SAP Assessment scheme.

The fabric of the building and the windows in particular, have been designed to ensure that any impact of external noise sources can be mitigated for residents. The Acoustic report submitted with the application includes measures to mitigate potential noise and these will be implemented in the design.

Scale

The scheme represents an efficient use of land and the development, as proposed, is designed to be proportionate to the scale of the surrounding area, and in particular the recent developments along the river frontage.

The stepped façade on Feering Street provides a transition between the 2 storey terraced housing and the three storey element of the new block, which has the impact on reducing the perceived massing and scale of the building.

The 2 storey element of the building is lower than the ridge line of the adjacent houses, while the roof of the three storey element is approx. 2.3m higher the adjacent ridge line, although it is over 12m away from the gable end of the houses.

The building is approx. 33m away from the frontage of the houses on Witham Street.

The scale is appropriate to the location and the setting.

Appearance

The appearance of the building is shown on the submitted elevations and the images included below:

The materials selected have been carefully chosen to be sustainable and long lasting with minimum maintenance whilst still providing a visually significant appearance whilst at the same time reflecting the predominant material in the immediate vicinity (Witham Street and Feering Street)..

The style has been kept simple and functional so as not to conflict with the surroundings.

Given the depth of the building, which is needed to achieve the required density a flat roof has been chosen to avoid the bulk and massing that a pitched roof would create.

To further reduce the perceived scale of the building the top floor is clad with a dark metal cladding system to create the sense of a roof and to create the impression of a two storey building with rooms in the roof.

The ground and first floor facades are finished with a palette of materials that reflect those present in the vicinity, These have been applied in panels to beak up the elevation vertically and again reduce the perceived scale of the building.

Deep windows, many with glazed Juliet balconies have been used to increase internal daylight but also to break up the facades and reduce the mass of the elevations.

The construction will be generally timber frame to speed up the construction period and provide high levels of insulation to improve the energy efficiency of the apartments.

The flat roof will enable maximum use of solar panels which can be orientated in the optimum position to maximise efficiency. Therse will not be visible from the ground due to the small parapet around the edge of the roof.

Proposed materials

Walls: Light Red bricks will be used as the plinth element to the Feering street elevation and the gable ends.

Above the plinth the walls are generally off white or white render to reflect the adjacent houses. The elevations are broken up with verical grey vladding surround to the balconies as can be seen on the design development sketch opposite.

Windows will have precast stone cills to match the local character

Windows and Glazing: All windows to the apartments will be grey powder coated aluminium or UPVC to complement the vertical cladding and reduce the visual impact of the frames on the elevations.

The will have slim profiles to maximise internal light levels.

Roof/top floor cladding: The top floor cladding will be vertical standing seam metal cladding with a dark grey finish. The flat roof will be a single ply membrane with solar panels on ballasted supports.

Landscaping/Ecology

To meet with the requirements of the relevant Local and National Planning Policies and the Biodiversity aspects of SUDS drainage, areas have been allocated for enhanced biodiversity within the site.

These areas will provide a location for planting of appropriate plant species.

The total area of landscaping in the proposed scheme is greater than the existing situation and the areas will be planted with a more diverse planning mix to increase the net gain in Biodiversity.

The existing site had 0m^2 of area with any significant biodiversity or ecological value as set out in the PEA. the proposed development has over 580m^2 of landscaped area, which is a significant increase on the existing. In addition there is an area of formal community amenity space which contributes up to 196m2 of additional area with enhanced biodiversity.

All proposed planting will be hardy and low maintenance and suitable for use in a rain garden environment.

The areas will act as a swale and/or rain garden and will be incorporated into the overall SUDS drainage strategy as shown on the submitted drainage layout plans.

A full landscape scheme (1229.01---Detailed Soft Landscape Plan) prepared by a suitably qualified landscape architect has been prepared and is included in the application.

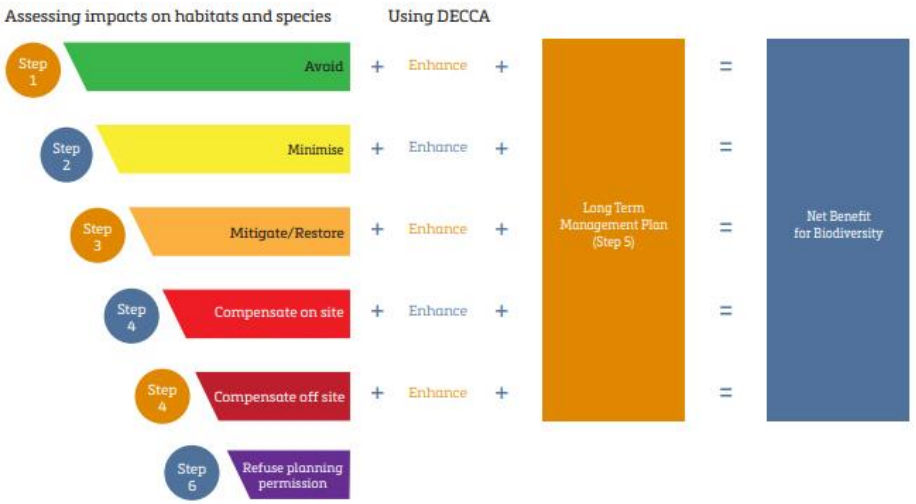
The scheme clearly sets out the proposed plant species and planting densities and is deemed to be an appropriate response to the site and the brief provided.

Biodiversity and GI Strategy

The need to address biodiversity and geodiversity during the design process as set out in the relevant SPG is recognised. During the design, the impact of the proposals has been assessed to ensure that there are no adverse impacts on local biodiversity and that the proposed development will provide a net gain in terms of biodiversity.

A full Green Infrastructure Statement has been prepared and included in the submission. This document is summarised in the following section.

The guidance documents set out a Stepwise approach to biodiversity improvement that should be adopted within a GIS as shown on the diagram opposite.



The following sets out how the proposals have been developed in line with this Stepwise approach:

Avoid

There is no planned removal of any existing significant ecological features. Currently the site has limited ecological value with small areas of scrub that have grown through concrete surfaces that covers most of the site. The PEA has classified the site as Low Ecological Value with no significant features and no connectivity.

Protect Existing features

No existing significant biodiverse features are being removed as part of the development, nor are there any that require protection. The existing street trees that are adjacent to the site will be protected and enhanced.

Minimise

There are no existing features that are being removed or affected. No harm is being caused and as such the harm does not need to be minimised.

Mitigate/Restore

Whilst there is no loss of existing ecological features, and as such no requirement to mitigate, there are proposals to increase and improve the range of ecological features and opportunities on the site.

Reinforce existing features

There are no significant features that would benefit from reinforcement or improvement.

Introduce New Habitats and Features

The proposed landscaping strategy for the site introduces a large area of new formal landscaping with a range of new species of plants and trees which will significantly increase the biodiversity of the site.

The provision of new bat boxes to the elevations in line with the recommendations of the PEA is an increase in ecological features and is a further net gain in Biodiversity for the site.

Compensate

As there is no loss of features and a proposed increase in biodiversity there is no requirement to compensate and the stepwise approach has been satisfied.

In order to achieve a net gain in Biodiversity the proposed scheme has included areas of landscaping associated with the Sustainable Drainage solution which will increase the flora on the site and potentially encourage insects and birds to the site.

In addition, the building itself will incorporate bat and bird boxes within its façade to encourage new species to the site. These are indicated on the submitted elevations.

The design process has adopted the step-by-step approach to assessing biodiversity and the combination of the landscaped areas and the bat/bird boxes will provide a net gain in terms of biodiversity in accordance with the relevant planning policies and SPGs.

Community Safety

TAN 12 suggests that community safety can be achieved via design solutions that can aid crime prevention. These include providing natural surveillance, improving safety by reducing conflicts in uses, and promoting a sense of ownership and responsibility.

The proposed scheme has been designed to meet Secured by Design standards and a formal application is being submitted. Consultation is taking place with the local Designing Out Crime Officer (DOCO) and their recommendations will be included in the site and building design.

The development has been designed to protect property and ensure the community's and individual's safety by allowing for natural surveillance of all parts of the site. The nature of the proposed development will ensure activity on site throughout the day which is a natural deterrent to crime and anti-social behaviour.

The site is currently the location for a range of antisocial behaviours that are negatively impacting on nearby residents. This activity continues despite increased security and preventative measures. The only real solution to the problem is for the site to be substantially developed.

There are no adjacent properties adversely affected by the proposed development.

If required CCTV coverage will be included to protect vulnerable parts of the building.

Air Quality

The Air Quality SPG includes a questionnaire that provides requirements to mitigate any adverse effect the development may have on existing air quality. By following the questionnaire the development is deemed to be a Scenario 4: Major Developments and Traffic Emissions, which requires a simple Air Quality Assessment (AQA) to be carried out.

Given that the projected car ownership and usage is limited (see parking section) the trips generated by the development will be relatively low.

To reduce the impact of the cars that will use the site the RSL is encouraging the use of electric vehicles. To facilitate this 6 electric vehicle charging points have been included. This is more than the amount required by the Sustainable Travel SPG which suggests 10% of parking spaces, or 3 charging points.

In addition, infrastructure will be included to enable all spaces to have access to charging points in the future. These will be fed from the landlords supply and operated using an app that will be available to residents. The landlords supply will benefit from PV electricity generation with tenants cars acting as suitable storage for any excess energy created.

The initial findings suggest that the air quality impacts at existing sensitive properties as a result of additional traffic generated by the proposed development will be insignificant.

A further reduction in parking numbers, and associated car use, has been considered. However, it is unlikely that any further reduction would be supported by the Highways Officer.

A large, secure cycle store is included in the scheme and the HA will encourage the use of cycling, walking and public transport as part of their management strategy. This will be set out in a Travel Plan which will be prepared as part of a full planning application.

The net result of the actions taken is a significant reduction in private car and HGV trips to and from the site and the potential reduction in emissions from those vehicles that do use the site.

It is contended that the requirements of the Air Quality SPG have been satisfied.

It is not anticipated that the proposed development will have any negative impact on Community Safety.

Environmental Sustainability

As identified within Technical Advice Note 12, Developers are required to achieve efficient use of and protection of natural resources, to enhance biodiversity and to design for change.

The site is situated in an inherently sustainable location by virtue of its position within Newport and its close proximity to public transport routes and local facilities (as

described in the following Access Statement), thus minimising the use of the personal car.

The site will be developed to accord or exceed with the latest Building Regulations standards. The overall sustainability principles of the development therefore are considered to be high.

In line with WG funding requirements the dwellings will achieve a SAP/EPC Rating of A.

The Proposal has been designed with its impact on the environment a key factor. The sustainability of the buildings in construction and use has been considered.

Materials

The proposed materials for the Proposal have been sourced with sustainability in mind. The walls, floors and internal finishes all achieve an A or A+ rating in the Green Guide to Specification (published by BRE).

Wherever possible, recycled aggregates will be used in the construction of the floor slab make up and sub base.

Energy Efficiency

The proposal will seek to contribute to energy efficiency and carbon reduction by being net zero carbon in operation. This will be achieved by:

- The use of an extensive array of Solar PV panels on the roofs with battery back up to make best use of electricity generated,
- Landlord's electricity supply linked to PV array and used to power electric vehicle charging points,
- High efficiency, all electric heating to make best use of on site generated electricity,
- The use of Modern Methods of Construction (MMC) wherever possible,
- The installation of Mechanical ventilation possibly with Heat Recovery to all apartments,
- Achieving U values in excess of Building Regulations to improve the energy efficiency of the dwellings and they will be constructed to ensure minimum air leakage to further improve efficiency.
- Ensuring that the design and construction achieves air permeability rates below the minimum required for Building Regulation compliance,
- The specification of the glazing includes low e glass to reduce heat loss in winter and solar controlled glass to reduce heat gain in summer,
- The use of energy efficient lighting throughout the development,

Transport

The Access Statement below confirms that the location is well served by public transport and this will have an impact on the sustainability of the development as a whole.

Noise

Traffic noise from the adjacent residential streets is not anticipated to be an issue. The potential for noise from the commercial premises on Feering Street will be investigated by a noise survey.

The standard form of construction proposed is likely to be sufficient to mitigate any potential noise impact from these sources.

Waste

A dedicated recycling storage space area is provided to each kitchen in both the apartments and the houses in accordance with DQR standards.

There is a dedicated external bin store for the apartment block which has been designed to accommodate the size and number of bins required by the residential Waste Storage and Collection SPG. The bin store is located in an accessible location for both residents and refuse collection operatives with a safe and level access.

As shown on the site plan (1660PL1:05) the bin store has sufficient space to accommodate the following number of bins as set out in the Waste Storage and Collection SPG (table 1, page 7) and accepted at a similar recent development in Newport.

Details of the bin store are shown on drawing 1660PL:11.

The agreed number of bins provided within the bin store is:

Waste	Recycling	Which gives a total of:
120l per apartment= 4200l	2 x1100l card	8 number 1100l bins
	2 x1100l plastic/cans	2 number 360l bins
= 4 large 1100l bins	2 x 360l glass	2 number 240l bins
	2 x 240l food	

The bin store has a gate which is locked with a keypad to restrict access to residents and waste collection operatives and is overlooked by the apartments to the Witham Street elevation to improve security and prevent unauthorised use.

Waste Minimisation Strategy

It is key that we ensure finite resources are used responsibly by minimising waste, maximising recycling opportunities and by promoting the use of materials with less environmental impact.

Waste minimisation will be considered in all stages of the development, from demolition through to construction. Some of the measures at all stages have been listed below:

- Use of materials that could be re-cycled in the future including masonry, brick and aluminium,
- Standard components and opening sizes used where possible to minimise off-cuts and wastage.

- High quality robust materials used to minimise need for future replacement and future waste,
- Promote responsibly sourced, low embodied energy and local sourced components where possible to minimize environmental impact and wasted energy use in manufacture and transport,
- Investigate using materials with a higher recycled content, such as aggregates, bricks, blocks, mortar etc.
- On site minimization of site waste and promote recycling on site during construction,
- Promote recycling ethos for building users by providing large, well located, bin store areas with easy access for residents and collection services.

Drainage

A detailed Drainage Strategy and design has been commissioned and will be submitted as an application to the local SAB in conjunction with the Full Planning application.

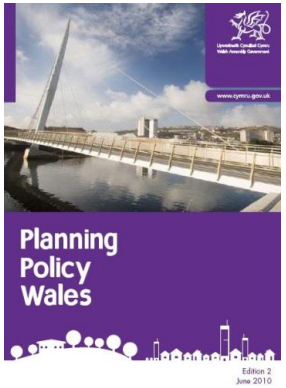
The exposed paved and parking areas will have a permeable surface to enable water to infiltrate to the carefully installed sub base which will wrapped to provide appropriate attenuation volumes and the water will be positively drained to the main surface water sewer at an agreed run off rate via a suitable hydro brake.

The roof drainage will be piped from the roof to ground where it will be transferred to the rain garden/biodiversity areas. At this location it will either permeate into the ground (if permeability allows) or, after filtering through the rain garden be piped separately back to the main sewer in Kelvedon Road at an appropriate run off rate. The rain garden substrate will be designed to accommodate the appropriate volume of water to enable suitable run off rates to be achieved.

4.0 Planning Policy/Consultation

This Section identifies the National and Local Planning Policies that apply to the proposed development and briefly states how the proposals meet these Planning Requirements.

National Planning Policy



National Planning Policy is set out in Planning Policy Wales (Edition 9, November 2016), Ministerial Interim Planning Policy Statements (MIPPS) and 21Technical Advice Notes (TANs).

The following TANs are believed to apply to the proposal and have been considered during the design process:

- TAN 1: Joint Housing Land
- TAN 5: Nature Conservation and Planning
- TAN 11: Noise,
- TAN 12: Design
- TAN 15: Development and Flood Risk,
- Tan 16: Sport Recreation and Open Space
- TAN 18: Transport,
- TAN22: Planning for Sustainable Buildings.

Planning Policy Wales

Planning Policy Wales – Edition 9 (November 2016) is the principal document, which sets out the land use policy context of the Welsh Government, for the consideration and evaluation of all types of development.

Paragraph 4.1.2 refers to The Well-being of Future Generations (Wales) Act 2015 which places a duty on public bodies (including Welsh Ministers) to carry out sustainable development. In carrying out this duty, actions which public bodies must take include:

- setting and publishing objectives ("well-being objectives") that are designed to maximise its contribution to achieving each of the well-being goals; and,
- taking all reasonable steps (in exercising its functions) to meet those objectives.

The Act puts in place seven well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. These include the need for cohesive communities which are attractive, viable, safe and well-connected.

"Sustainable development" in Wales is defined as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

This chapter recognises the important function of urban areas where priority is to 'secure environmentally sound and socially inclusive regeneration to those urban areas which require it, so that they become more desirable places to live and work' (Para 4.6.1).

Subsection 4.9 states the Welsh Government's preference for the re-use of land. It mentions that brownfield sites in built-up areas will ordinarily be considered suitable for development, as they accord with sustainability objectives.

Chapter 8 deals with Transport and places emphasis on locating development to minimise the need to travel, particularly by private motor vehicle.

Paragraph 8.1.5 lists a series of transport objectives that the Welsh Government wishes to achieve through development planning, of which the most relevant to this application reads as follows:

- reducing the need to travel, especially by private car by locating development where there is good access by public transport, walking and cycling;
- locating development near other related uses to encourage multi-purpose trips and reduce the length of journeys;
- improving accessibility by walking, cycling and public transport;
- ensuring that transport is accessible to all, taking into account the needs of disabled and other less mobile people;
- promoting walking and cycling."

Paragraph 9.2.3 states that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing.

PPW clearly identifies the need to deliver well designed and sustainable development within settlement boundaries and preferably on previously developed or brownfield land.

This proposal meets those aspirations and further requirements included with the various advice notes that support PPW

Technical Advice Notes:

Technical Advice Note 1 (2015): Joint Housing Land Availability Studies, highlights the importance of joint studies, with emphasis on a plan-led system which requires adopted LDPs to be in place. The TAN sets out guidance on JHLA preparation and continues to emphasise the need for local authorities to maintain a 5-year land supply

TAN 12: Design, sets out 12 objectives of good design and it is contended that this proposal meets all of these requirements, which are:

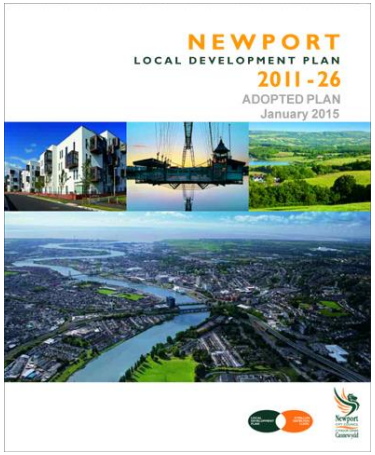
- Ensuring ease of access for all
- Sustaining or enhancing local character
- Promoting legible development
- Promoting a successful relationship between public and private space
- Promoting quality, choice and variety
- Promoting innovative design
- Ensuring attractive, safe public spaces
- Security through natural surveillance
- Achieving efficient use and protection of natural resources
- Enhancing biodiversity
- Promoting sustainable means of travel.

TAN 18 – Transport (2007) provides advice on transport related issues when planning for new development including integration between land use planning and transport, location of development, parking and design of development. Paragraph 2.1 relates to the integration between land use planning and transport, it states: "*An efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society.*"

Local Planning Policy

The relevant Local Planning Policy is the Newport Local Development Plan 2011 - 2026, adopted January 2015. This replaced the Unitary Development Plan (2096-2011).The Proposal has been designed to adhere to the aims and Objectives of the Core Policies set out in the LDP generally and with specific policies where relevant.

On the LDP Proposals Map the site lies within the urban area boundary but is not allocated for any specific use purposes.



Key Policies

The following Objectives and Strategic Policies set out in the LDP are deemed to apply to the Proposal and have been adhered to. These are the Policies that have been identified as relevant in the Pre Application Advice notes. The appropriate section of this document is referenced in blue in the following table:

Ref	Title	Summary
Newport LDP 2011-2026, adopted January 2015		
SP1	Sustainability	…. proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within an identified settlement boundary. Refer to: The principal of Development and Access Statement
SP3	Flood Risk	…. Development will only be permitted in flood risk areas in accordance with national guidance. Where appropriate a detailed technical Assessment will be required to ensure that the Development is designed to cope with the threat and Consequences of flooding over its lifetime. Sustainable Solutions to manage flood risk should be prioritised. Refer to: The principal of Development
SP10	House Building Requirement	Sets out the requirement for new houses delivery in the Authority on previously developed land and infill, windfall and small sites Refer to: The principal of Development
SP13	Planning Obligations	Proposals of this scale may be required to provide or make contributions to local infrastructure. Refer to: Planning Obligations
SP18	Urban Regeneration	Sets out how proposals that assist in the regeneration of areas will be supported. Refer to: The principal of Development
GP1	Climate Change	To ensure that developments can withstand climate change over the lifetime of the development Refer to: The principal of Development, and Sustainable Design
GP2	General Amenity	Policy to ensure that there is no significant adverse effect on the amenity of the existing or new community. Refer to Principle of Development and Communal Safety
GP3	Services Infrastructure	Policy to ensure justification of the suitability of the services infrastructure required by the proposal, e.g. sewerage. Refer to Principle of Development and Services Capacity

Ref	Title	Summary
GP4	Highways & Accessibility	The proposal must not detrimentally affect the highways capacity. There must be adequate public access and any new roads must be compliant with the Councils design scheme Refer to Sustainable Design & Parking
GP5	Natural Environment	Development must be designed to protect and encourage biodiversity and encourage connectivity and ensure that there are no negative impacts on protected habitats Refer to Landscape, nature Conservation and Ecology
GP6	Quality of Design	All new developments must ensure that they are to achieve good design. Refer to Principle of Development & Design Considerations
GP7	Environmental Protection & Public Health	Policy to ensure that there is no unacceptable harm to health from a development. Refer to: Principle of Development & Design Considerations
H2	Housing Standards	Policy states that residential developments should be built to high standards of environmental and sustainable design. Refer to: Design Considerations
H3	Housing Mix and Density	Residential development of 10 dwellings or more should be designed to provide a mix of housing to meet a range of needs and should be built at a density of at least 30 dwellings per hectare. Refer to: The principal of Development
H4	Affordable Housing	On site provision of affordable housing will be required on all new housing sites of 10 or more dwellings in the urban area. The Authority will seek 20% provision on sites in East Newport where the application site is located. Refer to: Planning Obligations
T4	Parking	Policy requires adequate levels of parking in accordance with the relevant SPG. Refer to Transport
T5	Walking & Cycling	A network of safe walking and cycling routes will continue to be developed and protected. Refer to Transport
W3	Waste Management Facilities in Development	Where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste Refer to Waste

Supplementary Planning Guidance

The following Supplementary Planning Guidance Documents are deemed to apply to the development generally and have been adhered to in the design of the building as referred to elsewhere in this document, particularly the Design Statement in Section 3: Design Analysis:

Ref	Title	Summary
Supplementary Planning Guidance documents		
SPG	Planning Obligations (2015)	Sets out guidelines for any Planning Obligations required as part of the Planning process: Refer to all sections
SPG	Affordable Housing (2015)	Sets out guidelines affordable housing contributions either on or off site: Refer to Principle of Development and Planning Obligations
SPG	New Dwellings (2015)	Establishes the criteria required for improving community Safety and designing out crime: Refer to Community Safety
SPG	Car Parking Standards	This document sets out the standards and level of parking for vehicles and cycles required for developments. It is based on the Welsh Parking Standards 2010. Refer to Transport
SPG	Sustainable Travel	This document sets out measures to ensure that sites are sustainable as possible in terms of pedestrian and other links to local amenities. Refer to Transport
SPG	Wildlife and Development	Sets out how biodiversity should be conserved and enhanced throughout the development control process Refer to Landscape, nature Conservation and Ecology
SPG	Waste Storage and Collection	Sets out the requirements for the storage and collection of recycled material and general waste from developments Refer to Waste
SPG	Outdoor Play Space	Sets out the requirement to provide or contribute to the provision of outdoor play space in the vicinity. Refer to Planning Obligations
SPG	Air Quality	Refers to the requirement to ensure air quality and the tests to establish if an air quality assessment is needed Refer to Community Safety

Planning Appraisal

The previous chapter identifies the relevant planning policies that should be taken into account in developing the design and assessing the Planning Application. Accordingly, this chapter provides an appraisal of the proposed development against this planning policy framework and other material considerations to demonstrate the acceptability of the proposals in Planning terms.

The key issues have been identified as:

- Principle of Development
- Planning Obligations
- Design considerations
- Sustainable design
- Transport
- Services Capacity
- Flood Risk
- Communal safety
- Landscape, nature Conservation and Ecology
- Waste

The Principle of Development

The development proposal is to provide 30 number 100% affordable apartments, comprising 22 one bed and 8 two bed units in a residential area on a previously developed site.

The site lies in an urban area, close to local amenities and public transport. These include a range of community and retail facilities located within easy walking distance of the site all in accordance with Policies SP1, GP1, GP2, GP3 and GP4.

PPW presumes in favour of sustainable development and the proposed development would satisfy PPW's objectives of achieving sustainable development by ensuring that local communities have sufficient housing for their needs and promoting access to employment, shopping and other facilities.

The redevelopment of brownfield sites within sustainable locations is supported by both national and local policies. The site lies within the urban boundary as defined on the Local Development Plan Proposals Map and the proposed development housing is compatible with LDP Policies GP5, GP6, H2, H6 and T4.

The proposals are of a reasonable density to make maximum use of the sustainable location on a brownfield site all in accordance with Policy H3.

All as confirmed in the Pre application advice received (PRELET/ PS/23/0106).

Planning Obligations

The Applicant is aware of the Planning Requirement for Affordable Housing as set out in Policy H4.

The proposal is for 100% affordable housing which satisfies the requirements of Policy H4 and the Affordable Housing SPG.

It is not anticipated that Education contributions will be required for the one bed apartments. However, there may be other contributions required.

As there is no capacity on site, if required, the applicant would seek to make a financial contribution in lieu of on site provision of outdoor play space in accordance with the relevant SPG.

The number of occupants calculated using the table on page 19 of the SPG is 49. This would result in the following requirements for outdoor space:

Type of Provision	Occupants	Area/occupancy (m^2)	Total (m^2)
Designated equipped playing space	49	2.5	122.5
Informal playing space	49	5.5	269.5
Outdoor Sport	49	16	784.0
Total	**49**		**1,176.0**

Design Considerations

This Design and Access Statement and plans submitted clearly demonstrate that the scheme will make a positive contribution to the local environment, in terms of its relationship with the surrounding area, and will effectively improve the character and legibility of this part of the river frontage whilst providing much needed Social rented accommodation.

The proposed scheme responds to the local character, referencing the existing residential developments in the area to ensure that the overall site has a legible architectural character, which is easy to navigate and creates a sense of community and enclosure.

A palette of materials has been selected which complement the site context, with sustainability at the forefront, particularly energy efficiency, noise and sound insulation.

The design has responded to comments made in the pre application advice and is considered to be entirely in accordance with Policies GP2, GP6, GP7 and H2 and also in accordance with the New Dwellings SPG.

Sustainable Design

The design has been developed with sustainability at the core of the process. The site is in an inherently sustainable location (see Access Statement and Site Analysis) and is accessible by public transport, cycles and pedestrians.

The Environmental Sustainability chapter in the previous section demonstrates the sustainable nature of the building in construction and operation.

The dwellings will benefit from modern efficient technology to improve efficiency and sustainability whilst future proofing for upcoming changes in domestic energy policy.

The sustainable design and location of the proposed development meet the requirements of Policy GP1: Climate Change.

Transport

The proposed development is in a sustainable location and is easily accessible by, foot, cycle, car and Public Transport. There is a bus stop in close proximity to the development which provides access to services to Newport Town Centre and the wider Public Transport network beyond. The Sustainable location of the site meets the requirements of SP1, GP1 and GP4.

On-site parking provision for cars and cycles is in accordance with Policy T4 and the adopted SPG for Parking and. A reduction is sought on sustainability grounds and to reduce emissions and improve air quality.

Cycle Parking is provided and there are a number of local amenities located within reasonable walking distance of the site. See Section 5:Access which sets out how the proposals are in accordance with the Sustainable Travel SPG.

Electric charging points are provided on site to encourage use of electric cars to further promote carbon reductions and improve air quality.

Detailed information is given in Section 5: Access Statement (Parking) and elsewhere in this document.

Services capacity

There is suitable capacity in the existing foul sewer system to accommodate the development as confirmed by Dwr Cymru/Welsh Water. All other services are present adjacent to the site and have sufficient capacity to serve the proposed development. The Proposal does not have any negative impact on local infrastructure facilities and is in accordance with Policy GP3.

Flood Risk

As set out in Section 2 the site is within Flood Zone C1. A flooding note has been prepared whilst a formal FCA is being finalised. .

The document, concludes that:

> *"……. that on the grounds of flood risk the proposed development site is in compliance with Planning Policy Wales and TAN-15, meeting the requirements set out in the Justification Test, Acceptability Criteria and using the actions set out in the Severn Estuary SMP for managing future flood risk."*

The FCA will set out the parameters required to ensure that the design meets the technical requirements of TAN 15 and that the safety of occupants and residents, as well as the wider community, is protected. Details of the measures taken are included in the previous design analysis section.

The proposals therefore meet the requirements of TAN15 and Local Policy SP3

Communal Safety

Provision is made for existing and future residents with the adoption of measures incorporating recognised designing out crime principles to ensure compliance with Policies GP2, GP6 and GP7. The design has been registered with Secured by Design, reference number NCC/SBD/6/22. (as referred to in Section 3: Design Analysis/Communal Safety). The project will be registered for Gold Award, as required for Grant funded affordable housing, and all requirements of the Designing Out Crime Officer will be included in the final design.

The site is subject to potential noise from the adjacent George St bridge, as addressed in the site analysis section. The design will mitigate the impact on potential residents as set out in the design analysis section and in accordance with the recommendations of the submitted acoustic report.

The development's impact on air quality is not deemed to be detrimental as set out previously and the requirements of the Air Quality SPG have been met along with Policy GP7.

The proposals will not have an adverse impact on neighbouring properties. There are no perceived implications for noise, air or light quality from the proposed development.

Landscape, Nature Conservation and Ecology

The site currently has no Ecological value. The proposed design will include a comprehensive Landscaping scheme which will improve and enhance the biodiversity of the site and meet the requirements included in the SUDS regulations.

Additional Biodiversity improvement measures including the use of bird and bat nesting boxes will be included in the development.

This will meet the requirements of Policies GP1, GP5 and the Wildlife and Development SPG.

Waste

Suitable provision has been made for the storage of recyclable materials and general waste within the apartments.

A dedicated external bin store is provided to accommodate the number and sizes of bins required by the Waste SPG. The bin store is located to enable easy collection by waste operatives and within easy reach of both entrances to the building.

The proposals meet the requirements of Policy W3 and the Waste Storage and Collection SPG.

Consultation

Flooding NRW

The Environment Agency web site and Development Advice Map has been consulted and it has been identified that the site lies in Flood Zone C1. See Site Analysis and Design Analysis sections for details.

Pre-Application Advice

An initial proposal was submitted for Non Statutory Pre Application advice in September 2023 (PRELET/ PS/23/0106). Initial advice was received on 2nd November 2023 and a meeting with the Planning Officer was held (online) on 15th November 2023.

Following the meeting a revised scheme was prepared addressing the majority of the concerns raised by the planning Officer and other consultees during the pre-application process.

Details of the design changes following the initial advice and meeting are set out in a planning note prepared at the time. This is included in Appendix 1 of this document.

Further advice was provided by the Planning Officer on 9th February 2024, including some areas where further design development was required.

The currently proposed scheme has responded to the issues raised in the advice received as set out below and previously in this document. The main issues identified in the initial Pre Application advice can be summarised as:

- Design & Amenity; Proximity to Witham Street, Massing, height, balconies,
- External Amenity Space,
- Parking numbers and Highways access,
- Flood Risk,
- Ecology,
- Biodiversity Enhancements (GIS),
- Potential for Noise,
- Air Quality,
- Sustainable Waste provision,
- SUDFS Drainage,
- Planning Contributions,
- Concern over possible overshadowing of Argosy Way

The above matters have been generally dealt with in the previous sections of this document.

Following the submission of revised drawings and the planning note in Appendix 1, further advice was provided, which included commentary on the matter listed above.

The advice confirmed that the majority of the issues had been adequately addressed, subject the appropriate information being provided in a formal Planning Application.

The main issues identified by the Planning Officer that needed to be resolved were:

- Balconies to Witham St to be enclosed as per Feeing St elevation: Shown on revised elevations.
- Details of privacy screens to Witham St parking boundary: Included on drawings and shown on this elevation.
- Potential overshadowing to 59 Feering Street: See Design Analysis section.
- Active frontage to SE Gable end: Refer to submitted elevations and Design Analysis Section.
- Details of ramped access: See drawings and description. Cross Sections added.
- Implications of existing Street Trees: See Design Analysis section and drawings.
- Parking Survey required to justify off site visitor parking shown on the plans: This has been included in the application.
- Confirmation of allocation of cycle parking spaces: Shown on drawings and described in DAS.
- Requirement for Air Quality Assessment in accordance with SPG. Included in this document.
- Railings for defensible space: Described in this document.
- Professional landscape scheme: Included in the application.
- Flood Risk: An FCA will be included in the application which will address water depth, velocities and safe means of escape in the event of a flood.
- Communal Amenity Space: Refer to Design Analysis section.

In addition to the above, the initial pre application advice set out what information would be required with a future planning application over and above the standard documentation requirements. The table below sets out these requirements and lists the information submitted in support of the application:

Information requested	Information submitted
PAC Report	1660PL1:DAS
Landscape scheme (hard & Soft)	1229.01
Flood Consequence Assessment;	NA-JBAU-XX-XX-RP-Z-0001-S3-P01-Kelvedon_FCA
Travel Plan	1660PL1:TP
Parking Survey	To be included in full planning application

Noise Assessment	To be included in full planning application
Preliminary Ecological Appraisal;	Spectrum Ecology-PEA-Kelvedon-MVR-041024
Tree Information in accordance with BS5837:2012;	Tree Constraints Plan, Tree Survey

Pre-Application Consultation (PAC)

Section 17 of the Act and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) as amended by the 2016 Order requires formal Pre-Application Consultation to be carried out for all major developments. A major development is defined as residential scheme that includes more than 10 houses and as such this scheme is subject to this requirement.

Guidance on carrying out the pre-application consultation requirements within the Act has been provided by the Welsh Government set out in Article 1 of the Town and Country Planning DMPWO (Amendment) 2016 'Guidance on Pre-application Consultation'.

Following the initial pre application advice being received, the proposals have been refined and full formal PAC is being carried out.

The final planning application will include a detailed PAC Report in accordance with the legislation.

5.0 Access Statement

This section explains how the proposed access arrangements make reasonable provision for all users have equal and convenient access into the site from its boundaries, within the site itself and also within the building.

The following legislation and guidance have been referred to during the design process and have influenced the design in terms of access:

- The Disability Discrimination Act 1995
- Building Regulations Part M (Access to and Use of Buildings)
- BS8300:2001 (Design of Buildings and their approaches to meet the needs of disabled people)

A summary of the site's accessibility in terms of public transport links, walking and cycling connections and access to local facilities is included below.

Movement to and from the Site

The Proposal is designed to be accessible to all. The site is accessible by car, cycle, walking and is close to public transport connections providing a range of transport options for potential residents. The site is also close to local amenities reducing reliance on the car and the number of trips generated by the proposed development, all in accordance with Policies of the Local Plan.

The following sections set out the current situation and any measures proposed as part of the proposal to reduce dependence on the private car.

Pedestrian Access

The site is in a sustainable location and is located close to many local amenities and facilities as well being well connected to the public transport network as described in detail in the site analysis section.

The site is located on Kelvedon Street, which, via Corporation Road, connects to the wider road network in Newport. Corporation Road links directly with Chepstow Road and the Newport Bridge which connects directly with the M4 to the North (Caerleon Interchange) and Newport Town Centre to the West.

Although well connected Kelvedon Street and the site itself is a relatively quiet road that offers safe access for pedestrians to the walking routes along the river to the West via Willenhall Street

The site has wide pavements on all sides that connect to the wider pavement networks and provide access to the local amenities, Public Transport connections and the City Centre.

There are existing Active Travel routes, including dedicated cycle lanes and bus routes from Corporation Road, to the city centre, and beyond into Newport's commercial sectors.

Maindee and St Andrews Primary Schools are both located within an easy 650m walk from the Site with safe footpaths for the entire routes. Lliswerry High Secondary School is just over 2.5km to the SE. The primary Schools are within recommended walking distances as defined by Chartered Institute of Highways and Transportation (CIHT) guidelines 'Providing for Journeys on Foot' and are the local catchment schools for the site.

Corporation Road District Centre is approx. 110m walking distance to the NE of the site along Kelvedon Street. The District Centre has a range of local amenities including convenience stores, health facilities and a Post Office.

There is a doctor's surgery and pharmacy on Kelvedon Street, which is within a level 25m walk from the site.

Newport City shopping Centre is approximately 900m walking distance to the Northwest of the site and provides a range of facilities including retail outlets, a large Supermarket, public transport access, cultural and leisure activities along with a range of employment opportunities.

The site is close to a number of leisure and sports facilities such as Rodney Parade, Dragons Rugby and Newport Squash and Rackets Club to the North.

There are a number of public open spaces in the area including Lysaght's Park approx. 175m to the SE.

The site is also within 250m of the riverside cycle path on the Eastern bank of the river Usk with National Cycle Route (NCN) 47 on the opposite bank.

There is an Active Travel route immediately adjacent to the site which runs along the eastern river bank and connects to the city centre, and beyond into Newport's commercial sectors.

The extract from Newport Maps included in the Site Analysis section shows these routes:

The majority of roads within the vicinity of the proposed development have footway provision on one or both sides of the carriageway.

The Chartered Institute of Highways and Transportation (CIHT) guidelines 'Providing for Journeys on Foot' indicate that the desirable walking distance for commuting and school journeys is 500m, the acceptable walking distance is 1km, and 2km is the preferred maximum.

The guidelines also indicate that walking trips for other purposes have a desirable walking distance of 400m, acceptable distance of 800m and the preferred maximum of 1.2km.

CHIT Table 3.2: Suggested Acceptable Walking Distance.

	Town centres (m)	Commuting/School Sight–seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

The table in the Site Analysis section shows the local facilities/amenities within walking distance of the proposed development.

Given the reasonably good pedestrian links there are no additional proposals necessary to increase accessibility for pedestrians other than the ongoing promotion of walking as an environmentally friendly and healthy alternative to the private car.

Cycle Access

The site is readily accessible by cycle and cycle storage is provided as part of the design in accordance with the Parking SPG.

The Local Authority Active Travel Plan (see Site Analysis) shows an Integrated Route close to the site along the banks of the River Usk.

Cycle Storage

Cycle Parking is provided on site in accordance with the Sustainable Travel SPG. This requires 1 space per 2 bedrooms for Long Stay and 1 space per 20 bedrooms for short stay (visitors).

As there are 38 bedrooms in the development (22 one bed and 8 2 bed units), 19 long stay and 2 short stay cycle spaces are required.

The 19 shorts stay spaces are shown on the site plan in a secure gated cycle store accessible from Witham Street. The cycle parking is currently floor mounted Sheffield stands set out in accordance with the guidance documents. However, a combination of 2 tier cycle storage and larger spaces with Sheffield Hopps , as per Crawford St, may be considered as part of the future application.

2 Short stay cycles will be provided close to the entrance to the apartments. The cycle storage will be a bespoke size Premium Amazon cycle shelter with a sedum roof supplied by The bike storage company.

The cycle store will be locked with a keypad contolled gate and will have have a sedum roof to prevent unauthorised access to the cycles, as well as assisting with the SUDs strategy.

https://www.thebikestoragecompany.co.uk/product/premium-amazon-cycle-shelter/

Short stay cycle parking is provide by 2 stainless steel Sheffield hoops, providing 4 spaces, located adjacent to the entrance to the apartments.

Vehicle Access

The site is located on Kelvedon Street, which connects to the wider road network in Newport. Kelvedon Street links directly with Corporation Road which connects to Caerleon Road (B4596) which provides links to the M4 to the North (Caerleon Interchange) and Newport Town Centre to the West.

Although well connected Kelvedon Street and the surrounding streets bordering the site are relatively quiet and offer safe crossing for pedestrians to the walking routes along the river to the West. The site is well served for vehicle access with all local roads being suitable for both car and commercial vehicle access.

The site includes an appropriate number of parking spaces in accordance with the Parking Standards SPG (see below) and electric charging points will be provided for in excess of the 10% of spaces required by the Development Management Air Quality SPG (refer to Air Quality section above).

Public Transport Access

There are a variety of bus stops and modes of public transport within the site's vicinity. There are bus stops within a 200m and Newport Train station is less than 1.5km walking distance from the site.

For a detailed assessment see the parking sustainability calculations in the following section.

The buses also provide an easy connection to the main bus station and train station within Newport City Centre, which provides access to regional and national connections.

The site is well served by Public Transport that provides regular connections to the City Centre and nearby amenities.

The site is well served by Public Transport that provides regular connections to the City Centre and nearby amenities. All of these public transport facilities are well within recognised walking distances as set out in national guidance documents such as the CHIT 'Providing for Journeys on foot' referred to above.

Movement within the site and buildings

The development is generally accessible to all. The buildings will be designed to fully comply with the requirements of Part M of the Building Regulations.

The internal layouts of all of the dwellings have been designed to ensure access for all. All have been designed to meet the Requirements of Part M of the Building Regulations and Lifetime Homes.

A level approach is provided to all dwellings with an appropriate low rise threshold included to enable disabled access.

All internal doors will be appropriately sized to accommodate disabled users and will be finished to ensure they are visible to those with partial sight.

A lift has been provided to give access to all upper floors and the raised Ground Floor.

Sustainable Travel

The Sustainable Travel SPG sets out guidance on linkages with the wider area and requests that all planning applications for Major residential development set out how the proposed development will link with its surrounding community and environment. To support the application and to show compliance with the SPG the following information is offered in conjunction with the previous section:

The previous plan shows the facilities listed in the SPG, Schools, Healthcare, Parks and Leisure and Public Transport Services. The following sets out how people will travel sustainably to these facilities:

Catchment Primary School

The Catchment Primary Schools are St Andrews Primary School, Maindee Primary School and Ysgol Gymraeg Caesnewydd.

St Andrews Primary School is 635m walking distance from the site on safe and accessible pavements.

The Welsh Medium Primary School, Ysgol Cymraeg Caesnewydd is approx. 2.7Km walking/driving distance from the site.

Catchment Secondary School

The Catchment English Medium Secondary School is Lliswerry High on Nash Road to the South of the site. This is approx. 2.8km walking distance on safe and level pavements.

There is also a bus service to the School (74) which can be accessed on Maindee Square.

The Catchment Welsh Medium Secondary School is Ysgol Gyfun Gwent Is Coed on Dyffryn Way. This is a considerable distance but the School is served by the YG1 and YG2 bus which can be caught from the City Centre which is easily accessible by bus from the site.

Healthcare Provider/ GP Surgery

The nearest GP Surgery is The Rugby Surgery on Kelvedon Street and is a 25m walk form the site. This is well within the acceptable walking distance on the table above.

There is a pharmacy adjacent to the Surgery (Well Pharmacy) and also in the District centre.

Parks/Leisure Facilities/Open Space

There are a number of Parks and Leisure facilities within the area which are easily accessible from the site. Lysaght Park is within 180m of the site which includes a children's play area and a basketball area.

Rodnety Parade, Newport Squash Rackets Club and Newport Athletic Club are conveniently located as easy 850m walk to the North.

The site is well connected to public open space.

Public Transport Services

There are a variety of bus stops and modes of public transport within the site's vicinity. There are bus stops within 250m and Newport Train station is less than 1.5km walking distance from the site.

The bus stops provide access to a range of bus services including the 42, 43, 5, 9A and 9C at Corporation Road (250m away).

The buses also provide an easy connection to the main bus station and train station within Newport City Centre, which provides access to regional and national connections.

Given all of the above the proposed site will meet the test of accessibility set out in the Sustainable Travel SPG. This should enable the requirement for parking at the site to be waived.

Sustainability Calculation/Parking

Car parking provision for the proposed development is required in accordance with Newport City Council Parking Standards, March 2015, which is supplementary planning guidance of the Local Planning Authority.

The parking standards also refer to the use of Travel Plans and the sustainability of new developments.

The parking standards quotes paragraph 8.4.2 of Planning Policy Wales which states: '*Car parking provision is a major influence on the choice of means of transport and the pattern of development. Local authorities should ensure that new developments provide lower levels of parking than have been generally achieved in the past. Minimum parking standards are no longer appropriate.'*

The document also notes that: *'These parking standards will inform observations made by the Highway Authority at Newport City Council on applications received for Planning Permission.'*

The adopted parking standards introduced a system of zones for parking and the standards 'lay out six such zones, each with differing designated levels of parking requirement for development management purposes.'

It is considered that the proposed development site is located in a Zone 4 urban location as per the definition detailed in the parking standards.

Car parking provision for the proposed development will be provided in accordance with Newport's adopted maximum parking standards as set out below.

For Residential new build and Conversions in Zones 2-6, the Parking Standards require 1 space per bedroom with a maximum of 3 for each dwelling, with 1 visitors' space for every 5 dwellings.

The following is the parking requirement if the SPG guidance is applied:

Apartment Type	Number	Maximum Parking Standards	Maximum spaces
1 bed apartment	22	1 space per bed	22
2 bed apartment	8	1 space per bed	16
Visitors		1 space per 5 dwellings	6
TOTAL	30		44

Based on this calculation a maximum of 44 spaces would be required for the dwellings including 6 visitors' spaces.

Parking is provided on site for 30 cars, 1 per apartment and no visitors, as shown on the submitted site plan. Whilst this is below the maximum number suggested by the Parking Standards it is an appropriate number for the specific development based on the sustainable location of the site.

There are a number of factors that should inform an assessment of what is an appropriate number of parking spaces. This would include the likely level of car ownership and the sustainability of the location.

The Car Parking Standards SPG includes sustainability criteria in Appendix 5 that allows the parking levels to be reduced if certain criteria are met. This site meets many of the stated criteria as set out in the Sustainability calculation in the Site Analysis section (page 13).

The site scores a total of 13 in the sustainability calculations.

This allows a reduction of 2 spaces per unit, with the proviso that the number does not drop below 1 space per unit. The impact on the maximum parking spaces by house type is shown below:

House Type	Number	Maximum Parking Standards	Maximum spaces	Sustainability Reduction	Adjusted number
1 bed apartment	22	1 space per bed	22	0	22
2 bed apartment	8	1 space per bed	16	8	8
Visitors		1 space per 5 dwellings	6	6	0
TOTAL	30		44		30

As the chart shows the new maximum number is now 30 including 0 visitors' spaces on site. Although no visitors' spaces are shown on the site itself there are opportunities for on street visitors parking adjacent to the site. There is a dedicated area for parking on Witham Street adjacent to the site that could accommodate up to three visitors spaces. These are shown on the revised site plan.

There is also available space on adjacent streets that could accommodate potential visitors parking. To substantiate this a parking survey has been provided that shows that there is capacity in the surrounding area for visitors spaces.

A Travel Plan will be provided as part of the planning application as required by the SPG.

It is suggested that the level of parking provided is entirely appropriate for the site location and tenure. As the numbers are less than the maximum permitted by the SPG to parking provision is entirely in accordance with the Parking Standards and Sustainable Transport SPGs.

6.0 Summary and Conclusions

The current proposal is for the development of 40 high quality affordable dwellings on the river frontage in Newport. The project meets the following requirements:

- The completed development will be managed by a recognised Registered Social Landlord delivering high quality affordable accommodation for the people of Newport.
- The proposal is for a high-quality development to address an identified need for new affordable housing.
- The site is in an accessible and sustainable location with easy access to many local facilities and public transport options.
- The proposal has minimal impact on adjacent occupiers and has no impact on their amenity.
- The dwellings will be sustainable in their construction and operation.
- The proposal includes a significant increase in on site biodiversity and has no negative impact on existing biodiversity either on or off site,
- The proposal is in line will all policies identified in National Planning Guidance, the adopted Local Plan and Supplementary Planning Guidance.

For these reasons it is felt that this is an appropriate development that will meet with the approval of the Planning Officers and the Local Authority Planning Committee'

7.0 Appendix 1:

Note submitted for revised Pre application advice setting out design changes to the initial submission.