

# PLANNING STATEMENT

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## COVERACK ROAD PHASE II

April 2025



# Summary

**Proposal**

Proposed development of 40 flats with associated works.

**Location**

Land at Coverack Road, Newport, NP19 0DS

**Date**

April 2025

**Project Reference**

23.220

**Client**

Hedyn

**Product of**

Asbri Planning Limited  
Unit 9 Oak Tree Court  
Mulberry Drive  
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Cardiff CF23 8RS

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**Report Revision No.**

Rev. B

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## Introduction

- 1.1 Asbri Planning is appointed as planning agent to Hedyn to prepare this Planning Statement to accompany the full planning application for residential development of 40no. flats with associated works at land at Coverack Road, Newport.
- 1.2 The Planning Statement acts as a supporting document to the accompanying planning application and should be read in conjunction with all other elements of the application. The following drawings prepared by Kennedy James Griffiths to accompany the application:

| Drawing name               | Drawing reference |
|----------------------------|-------------------|
| Location Pla               | 1671 PL:01        |
| Site Analysis drawing      | 1671 PL:02        |
| Existing Site Plan         | 1671 PL:03        |
| Proposed Site Plan         | 1671 PL:04        |
| Proposed Ground Floor Plan | 1671 PL:05        |
| Proposed Upper Floor Plan  | 1671 PL:06        |
| Proposed Elevations        | 1671 PL:07        |
| Proposed Context Elevation | 1671 PL:08        |
| 3D Images                  | 1671 PL:09        |
| Type A Plans               | 1671 PL:10        |
| Type B Plans               | 1671 PL:11        |
| Type C Plans               | 1671 PL:12        |
| Context Site Plan          | 1671 PL:13        |
| Massing Comparison         | 1671 PL:14        |

- 1.3 In addition, the following supporting documents are submitted.

| Document                          | Prepared by             |
|-----------------------------------|-------------------------|
| Planning application forms (1APP) | Asbri Planning          |
| Planning Statement                | Asbri Planning          |
| PAC Report                        | Asbri Planning          |
| Design and Access Statement       | Kennedy James Griffiths |
| Primary Ecological Appraisal      | JBA Consulting          |
| Habitat Regulations Assessment    | JBA Consulting          |
| Flood Consequences Assessment     | JBA Consulting          |
| Drainage Strategy                 | Quad Consult            |

|                                                         |                  |
|---------------------------------------------------------|------------------|
| Drainage Strategy 23005-SK-001-E                        | Quad Consult     |
| Impermeable Areas 23005-SK-002- B                       | Quad Consult     |
| OverlandFlow Paths 23005-SK-003-0                       | Quad Consult     |
| Typical SUDS Details 23005-SK-005-0                     | Quad Consult     |
| Hydropave prelim Design 25-5001-P1                      | Quad Consult     |
| Environmental Noise Assessment                          | Hunter Acoustics |
| Archaeological and Heritage Assessment                  | EDP              |
| Detailed Soft Landscaping Plan                          | EDP              |
| GI Statement                                            | Asbri Planning   |
| Transport Statement                                     | Acstro           |
| Travel Plan                                             | Acstro           |
| Sustainability Assessment                               | Asbri Planning   |
| Sustainability Plan                                     | Asbri Planning   |
| Geo-Technical & Geo-Environmental SI Report (June 2018) | Terrafirma       |
| Tier 1 Report                                           | Terrafirma       |
| Tier 2 Report                                           | Terrafirma       |

1.4 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- Section 2: provides a description of the site and its surroundings, including a review of the site's planning history;
- Section 3: summarises the development proposals.
- Section 4: provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
- Section 5: outlines the relevant planning policy context, at both the national and local level.
- Section 6: addresses the key planning considerations associated with the development proposal.
- Section 7: provides a conclusion regarding the overall acceptability of the application.

# Site Description

## General Location

- 2.1 The application site is located at Coverack Road, to the east of the River Usk, near to the centre of Newport. It is centred on grid coordinates X: 331994, Y: 187755.
- 2.2 The site's surrounding context is largely residential, with properties located in close proximity to the south and north of the application site. The George Street Bridge, a Grade II Listed bridge constructed in the early 1960s, is situated immediately to the north of the site and connects east and west Newport.



Figure 1: Satellite image of site and immediate proximity.

## Site Description

- 2.3 The application site comprises a rectangular parcel of brownfield land measuring approximately 0.17 Ha in size, on Coverack Road located to the east of the River Usk. The site is currently vacant, and is understood to have been vacant for a number of years dating back to the mid-2000s since the demolition of a former paint mill which occupied the site,
- 2.4 More recently, the site has been used as a compound to facilitate the development of 'Phase 1' residential development off Coverack Road, along the banks of the River Usk. As such, the surrounding context is considered to be largely former industrial, now residential, reflective of the local character of terraced properties within the vicinity and of several-storey high residential blocks along the River Usk.

## Planning History

- 2.5 A review of Newport City Council's online planning registry indicates that the application is subject to the following planning history:

| Application Ref: | Proposals                                                                                                         | Date determined | Decision |
|------------------|-------------------------------------------------------------------------------------------------------------------|-----------------|----------|
| 10/1087          | "Outline application for residential development, comprising up to 77 apartments and up to 94 car parking spaces, | 11/07/2011      | Refused. |

|         |                                                                                                                                                                                                             |            |          |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------|
|         | using relocated access off Coverack Road, with all other matters reserved.”                                                                                                                                 |            |          |
| 12/0666 | ‘Outline application for residential development, comprising up to 77 apartments and up to 94 car parking spaces, using relocated access off Coverack Road, with all other matters reserved (resubmission)’ | 06/06/2024 | Refused. |

### Context Analysis

- 2.6 The site is bound by a private driveway (accessed off Coverack Road) which serves the now built ‘Phase 1’ on Coverack Road to the north of the site. The site’s urban environment is reflected by a range of modern residential and commercial developments present within its surroundings, including Tramway and Bankside House to the north-west, and Argosy House to the south east on the opposite side of Coverack Road.
- 2.7 The character of the houses on Coverack Road, which forms the main approach to the site, is typically urban with a predominance of two storey terraced houses with some semi-detached houses, all sitting close to the pavements with limited front gardens.
- 2.8 As established, the application site is located almost adjacent to the Grade II\* Listed George Street Bridge, which was constructed in the early 1960s. Further detail on the local heritage context is written within section 2.17 onwards of this planning statement.
- 2.9 The site is located within Newport’s Victoria Ward, and is considered to be well located to provide a variety of opportunities in connecting to nearby employment uses within walking and cycling distance.
- 2.10 With regard to flooding, NRW’s Development Advice Map for flood risk indicates that the application site is located within Flood Zone B ‘Areas known to have flooded in the past’. NRW’s Flood Map for Planning, which is based on more-recent modelling and is being used to guide the forthcoming TAN15, indicates that the site is not considered to be at risk of rivers or sea flooding, nor is it at risk of surface water or small watercourse flooding.

### Highways

#### Access

- 2.11 Access onto the site is primarily facilitated by Coverack Road, which connects to Corporation Road, a major highway within the central-east area of Newport. Pedestrian access onto the site can be achieved by the footpath to the south of the site, which runs along the River Usk.
- 2.12 A review of Welsh Government data on Active Travel indicates that the application site is well-located in terms of active travel linkages. Coverack Road is identified as an ‘Existing Walking and Cycling Route’, while the B4237 (travelling over the George Street Bridge) is identified as an ‘Existing Walking Route’.
- 2.13 Newport Railway Station is considered to be located in close walking distance to the site, located approximately 1.4km to the north-west of the application site on the other side of the River Usk. This provides regular rail services to nearby Cardiff and Bristol, in addition to services which operate to destinations further afield including London, Birmingham, and Manchester.

- 2.14 With regard to bus travel, the nearest bus stops to the application site are located approximately 270m to the south-east on Corporation Road. These provide services to other areas within Newport, including Lliswerry, Somerton, Kingsway, and Friars Walk.

### **Site Boundaries**

- 2.15 As established, the application site is vacant and has previously been used to serve as a construction compound to facilitate residential development to the north (known as Bankside House and Tramway House). Accordingly, land to the northern boundary comprises a car parking area which serves Bankside House and Tramway House. The site's eastern boundary comprises the access road which serves these residential blocks, which feeds off Coverack Road. Both the eastern and southern boundaries lie adjacent to Coverack Road.

### **Public Right of Way**

- 2.16 A review of Ordnance System Mapping indicates that a Public Right of Way (PRoW) runs along the site's eastern boundary, before turning east along the site's eastern boundary on Coverack Road.

### **Historic Environment**

- 2.17 As established, the application site is located in close proximity to the Grade II\* Listed George Street Bridge, with Cadw data providing the reason behind this listing as "*Graded II\* as a major civil engineering structure, the first cable-stayed cantilever bridge in Britain.*"
- 2.18 A review of Historic Environment Wales data indicates that a Pill (small inlet) is located to the west of the site on the banks of the River Ebbw, which may have been used as a landing place and shelter for boats in the mid-18<sup>th</sup> Century according to Glamorgan-Gwent Archaeological Trust data.
- 2.19 The Grade I Listed Newport Transporter Bridge is located downstream along the River Usk, located approximately 2.5km to the south of the application site. The reason behind this listing states:

*One of only 2 functioning major transporter bridges in the UK. Opened 12 September 1906. Joint engineers R H Haynes, Borough Engineer of Newport, and Ferdinand Arnodin, internationally famous as inventor and engineer of transporter bridges in Europe and North Africa. Contractor Alfred Thorne of Westminster. Traffic of tall-masted ships to wharves above the bridge meant traditional bridge structures were not practicable, and the river had to be spanned at high level. Height approximately 72m, clear span 196m. Restoration 1990's, including repairs to steelwork, and new cables; reopened December 1995.*

*The structure consists of 2 towers each of 2 elliptical lattice-girder pylons which support, at high level, a main boom upon which a trolley operated by continuous cable, powered by drum driven by two 35bhp direct current electric motors in cabin on the E side of the river, transports a gondola suspended by cables from the trolley. The boom is on the suspension bridge principle, supported both by oblique stay cables attached to the pylons, and by catenary cables anchored in chambers on each side of river. Pedestrian access to upper level by stairs on NE and SW pylons. Towers pin-jointed to bearings supported on bellshaped masonry piers (4 to each tower). On the E side is winding house raised above roadway on steel girders; 5 windows, walls of steel and wooden boarding, slate roof with iron cresting and finials. Wooden platform with iron gates, railings and turnstile to W. Iron gates, railings and turnstile on W bank. Gondola suspended from cables; gates to E and W. To N and S sides of gondola are shelters of steel girder and mesh construction, wooden handrails; wooden roofs with zig-zag valences. Above shelter on N side is octagonal operator's cabin with pagoda roof.*

*On each bank, approximately 140m away from bridge is an anchor chamber in which the main cables of the bridge are anchored; brown rock-faced stone; later additions."*

- 2.20 The application site is understood to have a very low potential to impact non-designated heritage assets, including remains from the prehistoric period through to medieval remains, based on the absence of previously recorded remains and the presence of alluvial deposits given its riverside context.

## Proposals

3.1 The proposed development comprises the development of 40no. affordable flat units, inclusive of one and two-bedroom flats, at land at Coverack Road. The full tenure mix proposed is provided as follows:

- 30no. one-bedroom (two people) flat units (50sqm and 51sqm; and
- 10no. two-bedroom (three people) flat units (60sqm).
- **Total number of units: 40no. affordable flat units.**

3.2 As established, the proposed development follows three pre-application enquiries submitted on behalf of Jehu Group in March 2020 and June 2021, and Hedyn in May 2024, respectively. Further context behind these pre-application queries is provided within Section 4 of this planning statement.

3.3 The proposed development has incorporated a number of the matters raised by the Council on these previous pre-application enquiries, relating to matters of scale, density, landscaping, and design.

### Amount

3.4 As above, the proposed development looks to deliver 40no. affordable apartment units within the site boundary, inclusive of one and two bedroom apartments.

3.5 As the properties are designed to be affordable and their development dependent on Welsh Government grant funding, the apartments will be designed to accord with the Welsh Development Quality Requirements.

3.6 This is considered to be an appropriate number of units proposed, reflective of the site's developable area, in addition to being guided by the site's immediate context including the proximity of the George Street Bridge and the number of units delivered by previous residential development on Coverack Road.

### Scale

3.7 The proposed development looks to reflect the design and scale approach apparent along this part of the River Usk, and is considered to comprise a continuation of residential development of a similar appearance.

3.8 As such, the proposed development comprises a five-storey scheme, reflective of the local context along the River Usk, and as established as an appropriate height and massing following previous pre-application discussions on this site. This is considered to reflect a scale which not only draws from the local context but reflects the site's need for a high-density development (given the small extent of the site's area).

3.9 This is considered to provide a gradual reduction in height from Bankside House to the 3 storey development to the south-east at Argosy Way. At 5 storeys tall the development would be the same height as Tramway House and a storey less than Bankside House, to the north-west of the site. Accordingly, the scale of the proposed development is considered to be appropriate to the site's location, and the setting of the site's vicinity.

### Layout

3.10 The shape and configuration of the site, along with the detailed site and design analysis conducted (reflected within the accompanying design and access statement), in addition to comments received through pre-application consultation, have informed the proposed layout which is considered to represent a positive, efficient use of space within the site.

- 3.11 The accompanying site layout demonstrates that a total of 40no. apartments can be accommodated within the site, which will front positively onto the River Usk, whilst ensuring that appropriate provision for parking and landscaping delivered.
- 3.12 As per the accompanying design and access statement, the primary drivers which have guided the site layout include the following aims:
- To provide a quality environment for residents;
  - To ensure no excessive overlooking to or from adjacent properties;
  - To ensure that suitable vehicular access is provided for residents and delivery and waste vehicles;
  - To ensure a suitable SUDS drainage scheme can be designed;
  - To ensure biodiversity of the site can be improved from the current situation;
  - To minimise the impact of traffic noise from the adjacent George Street Bridge;
  - To create a cohesive streetscape along the river bank that maintains the heights; and densities of previous riverside developments, including Phase 1 to the North of the George Street bridge.
- 3.13 The apartments are accessed by pedestrians from Coverack Road pavement via a path running parallel with the SE boundary behind the adjacent car parking. This path then becomes shared space across the car park to reach the dedicated entrance paved area which also accommodates the 4 number short stay visitor cycle spaces. Access from on-site parking spaces is via a shared space in accordance with manual for Streets principles
- 3.14 The proposed building itself is aligned NW/SE to address the River Usk, with 50% of the apartments having a view across the river. This addresses one of the concerns expressed regarding the scheme previously submitted for pre application advice.
- 3.15 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 densities set out in the housing allocation, the viability of the scheme would be compromised if additional onsite amenity space is required.
- 3.16 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.

### **Appearance**

- 3.17 As illustrated within the accompanying elevational plans, the proposed design comprises a range of materials, including the same brickwork as used in similar residential schemes along Coverack Road. This includes materials comprising white silicone render, mist grey horizontal cladding, anthracite grey horizontal cladding, and PPC balconies with glazed infill panelling.
- 3.18 The ground floor is generally a buff or red brick providing a solid 'plinth' on which the upper floors sit. To reinforce the effect the upper floors are clad in a lighter coloured material. This will be a combination of Marley Tectiva cladding system in chalk colour laid with varying height horizontal bands and off white silicon through coloured render as shown on the drawings and the materials section below. Deep windows with low cills have been used to increase internal daylight but also to break up the facades and reduce the mass of the elevations.
- 3.19 The flat roof of the block will comprise single ply membrane, with solar panels installed on ballasted supports as indicated in the relevant architectural plans.

- 3.20 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. These will not be visible from the ground due to the small parapet around the edge of the roof.
- 3.21 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).
- 3.22 In addition, the proposal seeks to contribute towards energy efficiency and carbon reduction by being net zero carbon in operation. This will be achieved by a number of measures, including the use of rooftop PV solar, a high-efficiency all-electric heating network, the use of modern methods of construction, the installation of mechanical ventilation, and the installation of high-specification, low e-glass windows to achieve heating efficiency.

### **Access and Parking**

- 3.23 As established, the proposal is considered to represent an extension to earlier residential development at Coverack Road ('Phase 1'), permitted under planning permission 18/1169, which will provide vehicular access into the site boundary of 'Phase 2' as part of the proposed development.
- 3.24 The car park is connected to the existing parking areas that serve Tramway and Bankside Houses ensuring that any spare capacity in the existing car park is readily available to occupants of the new development should it be needed.
- 3.25 As such, the proposals comprise the provision of a total of 32no. car parking spaces, inclusive of resident and visitor use. The parking numbers proposed are below the maximum permitted by the relevant SPG and are deemed appropriate for the expected and proven usage at the site as set out in the previous section and the Access Statement.
- 3.26 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.
- 3.27 The submitted Transport Assessment 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.
- 3.28 In addition, a total of 10no. secure bicycle parking spaces are proposed for the benefits of future residents.
- 3.29 The submitted Transport Assessment 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

### **Ecology & Landscaping**

- 3.30 Biodiversity enhancement opportunities have been incorporated into the detailed design of the development, in line with the objectives detailed within the Environment (Wales) Act which places a duty on Local Planning Authorities to conserve and enhance biodiversity.
- 3.31 As indicated within the accompanying landscaping plans, measures for biodiversity and landscape enhancement comprise a significant part of the proposed development. This includes a Landscaping Scheme (EDP) and a Green Infrastructure Statement (Asbri Planning) which demonstrate that the site's landscaping and biodiversity quality will be significantly enhanced through the proposed development, in accordance with the recent changes made to GI enhancement (Planning Policy Wales, 12<sup>th</sup> Edition).

- 3.32 Guided by the principles of biodiversity enhancement as stipulated within national and local planning policy the proposed landscaping scheme combines a carefully selected variety of plants, shrubs, and trees to create a dynamic, aesthetically pleasing, and ecologically beneficial environment. The design incorporates both ornamental and functional elements, including a mix of evergreen shrubs like Japanese Laurel, Aztec Pearl Mexican Orange Blossom, and Rakai's Hebe, which provide year-round foliage, vibrant flowers, and a lush texture. Hidcote St. John's Wort and Box Honeysuckle offer seasonal color and fragrance, while also serving as excellent ground cover or low hedging plants. Larger trees such as Hornbeam and Field Maple add vertical structure, enhancing the landscape's seasonal interest with their changing foliage and bark.
- 3.33 The bio-retention basin, integrated into the design, features a variety of moisture-loving plants such as Fool's Water-cress, Sharp-angled Sedge, and Yellow Flag Iris, which are crucial for stormwater management. These plants not only help absorb excess rainwater but also filter pollutants, improving the water quality of runoff and preventing erosion. The basin also supports a diverse range of wildlife by offering habitat for aquatic insects, amphibians, and birds, promoting biodiversity.
- 3.34 The landscaping scheme provides a variety of benefits for both biodiversity and amenity. The selection of native and water-tolerant species ensures resilience in various conditions while supporting local wildlife populations. By including plants that flower in different seasons, the scheme also provides visual interest throughout the year. The inclusion of both evergreen and deciduous plants ensures year-round coverage, offering shelter, food, and nesting opportunities for birds and insects. Overall, the design enhances the local ecosystem, promotes sustainable water management, and offers a high-quality amenity space for the community to enjoy.
- 3.35 It should be noted that the proposed development does not propose the removal of, or loss of trees as part of the proposals. This is largely influenced by the existing quality of landscaping on-site, which is considered to be significantly low and poor. The proposed tree selection focuses on enhancing both the visual appeal and ecological value of the landscape. The inclusion of Hornbeam and Field Maple provides structural height and seasonal interest, with their changing foliage offering vibrant autumn colors. These trees are well-suited to a variety of soil types and climates, ensuring resilience and long-term growth. Hornbeam's dense canopy provides excellent shade, while the Field Maple is known for its attractive bark and ability to support diverse wildlife, including birds and insects. Additionally, Sweetgum is introduced for its striking star-shaped leaves, which turn brilliant red and purple in the fall, further adding seasonal interest. These trees not only contribute to the aesthetic quality of the space but also support local biodiversity by providing shelter, food, and nesting opportunities for wildlife. Their varied forms and vibrant seasonal displays create a multi-layered landscape that will evolve throughout the year.

### **Energy**

- 3.36 Guided by TAN12 (Design), the proposed development looks to achieve a positive, sustainable development which includes measures for energy efficiency. All of the units proposed will be delivered to achieve an SAP/EPC Rating of A, while the site will be developed to accord, and if possible, exceed with the latest Building Regulations standards. The overall sustainability principles at hand are therefore considered to be high.
- 3.37 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; and
- The specification of the glazing includes low e glass to reduce heat loss.

## Pre-Application Discussions

- 4.1 The application site has been subject to a number of pre-application enquiries submitted to Newport City Council in recent years pre-application enquiry follows two earlier pre-application requests. These were submitted on behalf of Jehu Group in March 2020 and June 2021, for the delivery of 48no. units and 40no. units. Formal pre-application responses were issued by Newport City Council in July 2020 and August 2021 (ref: PRELET/P20/00044 and PRELET/P/21/0161).
- 4.2 Following the collapse of Jehu Group in October 2022, the application site was purchased by Hedyn. Accordingly, a third pre-application enquiry was submitted in May 2024 (P/24/0058) on behalf of Hedyn, which comprised the proposals put forward within this planning application. The proposals put forward within this pre-application enquiry incorporated a number of the matters raised by the Council on the previous pre-application enquiries submitted, including matters relating to scale, density, design, and landscaping.
- 4.3 As set out in the above, the application site has been subject to several pre-application enquiries for residential development. With regard to the proposals put forward within this planning application, a pre-application enquiry was submitted in May 2024 for the development of 40no. affordable flat units, with associated works, on behalf of Hedyn. This pre-application enquiry was registered under reference P/24/0058, and a meeting was held with Geraint Robers, allocated officer to the pre-app, in October 2024.
- 4.4 Initial written pre-application advice was provided in June 2024. These comments related to matters including highways, public open space, heritage, ecology, and noise, and are written below:

### **Public Open Space (POS)**

- *"Likely occupation is 65 persons giving a communal space requirement of 12\*65 = 780 square metres. Looking at the layout plan I would suggest that there is no meaningful communal space provided within the scheme. What is provided seems geared to meeting the SUDs requirement and would not be practicably usable for residents. However the site does have immediate access to natural green space.*
- *The Usk corridor does provide a high amenity area for people to relax in and enjoy outdoor exercise and this offsets the communal space for residents deficit to some extent. That said I would note the condition and amenity of the Riverside Walk is poor in the vicinity of the site where it passes under the George Street Bridge. On this site there is no space to provide any of this requirement and the Council would look to S106 to address this deficit in provision. The site is in the Victoria Ward of the City which shows deficit in all three categories of open space, more so than any other ward in the City.*
- *As such the Council may not be able to identify provision sufficiently close to the site for enhancement meaning that this deficit cannot be meaningfully addressed via S106. This would significantly count against the scheme in terms of green infrastructure and bio-diversity.*
- *Currently affordable dwellings are exempted from S106 contributions but we would expect any applicant to enter an agreement in any event to address the situation where units were subsequently released as market dwellings rather than as affordable housing. The Policy required level of affordable housing must be provided and any legal agreement will secure this minimum provision."*

### **Heritage**

- *"I have had a look over the proposals and the heritage assessment for 40 flats at Coverack Road. The site is next to the grade II\* listed George Street Bridge, therefore forms part of its setting. In principle, I would be happy to see the site redeveloped, however I have concerns with the layout of*

*the site and scale of the proposed building. It is understood that there are contemporary buildings to all sides of the bridge, hence my lack of objection to the redevelopment of the site. Furthermore, the setting of the bridge has been altered significantly through these more recent developments.*

- Nevertheless, from looking at both the site plan and contextual elevations, it is evident that this block would be significantly closer to the grade II\* listed bridge and inhibit views of the bridge entirely when accessing from Coverack Road. I don't think this has been sufficiently addressed or justified within the heritage assessment.*
- Furthermore, there are some highly important views when progressing along the bridge from Corporation Road; specifically views of the Grade I Transporter Bridge. Prominent glimpses of this iconic, nationally important structure are somewhat rare in Newport, and this particular location allows for a full panoramic view of the bridge sitting firmly within the cityscape. The proposed development obstructs a significant proportion of this view from one listed bridge to another, thus creating a visual disturbance to both of their setting's. Again, this has not been considered to an appropriate degree within the application. I have attached a document which shows these significant views of each listed bridge.*
- There are a couple of ways this could be addressed. Firstly, the orientation and plan form of the building could be altered to allow these views to remain prominent from both areas mentioned above. It would also mean the building sits further away from the bridge, reducing impact on its immediate setting. Secondly, the building could be reduced in height/stepped down where it sits closest to the bridge, this would have to sit below the line of the structure so these important vistas are retained. To ensure this is done correctly, a visual assessment should be completed.*
- Overall, I could not support these proposals if they were to be submitted as a full planning application. I strongly advise that the scheme is reconsidered prior to any further submission. If you have any queries, please do not hesitate to ask."*

#### **Car Parking**

- "There are two very similar flatted units close to this site which may offer robust evidence of tenant profile (age / employment) and car ownership. If this evidence is sufficiently robust then the Council may be in a position to give this weight and allow the parking reduction but this will have to be very well made out to be accepted even given the similarity of the schemes and their close location."*

#### **Noise**

- "A noise assessment will be required to demonstrate that the relevant internal noise standards can be met. It is accepted that the external areas (balconies) will not meet the relevant standards but this will not be seen as a reason not to have them."*

#### **Conclusion**

- "We are not able to comment with complete robustness due to the limited consultation undertaken in relation to this pre-application detail.*
- It is possible that the scheme amounts to over-development and that the identified issues are stemming from that with the unit numbers impacting on massing and therefore height / shading / overlooking & any overbearing effect.*
- Design issues and the relationship with the listed bridge structure are likely to be acceptable given the existing precedent to the north.*
- Lack of amenity space needs to be shown to be addressable, potentially improvements to the public realm within the vicinity of the site should be considered as a means to address this."*

- 4.5 In response to the Heritage comments provided, the Heritage Impact Assessment (HIA) submitted as part of the pre-application enquiry was updated to provide additional levels of detail.
- 4.6 Furthermore, a meeting was held in October 2024 with the assigned case officer, Newport City Council's Heritage Officer, and members of the design team, in order to discuss matters raised within the above comments, including the site's proximity to the Grade II\* Listed George Street Bridge and any potential impacts generated on the heritage asset.
- 4.7 Within this meeting, the LPA's Heritage Officer confirmed that they were happy with the additional level of detail provided within the revised report, and that they were agreeable to the arguments made in respect of the views of the Transporter Bridge from the application site George Street Bridge. Notwithstanding, the Officer maintained that the proposed development, would in principle, have result in the change of the setting of the George Street Bridge, with views from Coverack Road and Corporation Road impacted.
- 4.8 Accordingly, a massing exercise was undertaken by the design team, following the meeting. This presented visuals of the proposals at different locations within the site's vicinity, along with presenting alternative options to justify the orientation of the site as proposed. This massing exercise and graphics prepared accompany this planning application.
- 4.9 In addition, the Archaeological and Heritage Assessment prepared was revised to reflect the discussions had with the LPA and heritage officer, with reference to design changes made in response. Furthermore, an accompanying Heritage Technical Note was prepared in order to further establish that the proposed development would not significantly impact or alter the setting of the Grade II\* Listed George Street Bridge. At the time of submission all information has been collated and presented within the Archaeological and Heritage Assessment.
- 4.10 At the time of writing, a full, formal written response has not been received from Newport City Council in respect of this pre-application enquiry. Notwithstanding, the discussions had throughout the pre-application process are considered to be beneficial and have informed the proposals put forward within this planning application.

#### **PAC Process**

- 4.11 Statutory pre-application consultation (PAC) was undertaken between the 16<sup>th</sup> December 2024 until the 20<sup>th</sup> January 2025 inclusive. This comprised the erection of two site notices (bilingual) at the application site, the issuing of letters to all adjacent landowners (statutory consultees) and nearby identified residents, and the issuing of letters to all identified specialist and other consultees.
- 4.12 In addition, as part of PAC a public engagement event was held at Rosier's Dojo, 1 Witham Street, on Wednesday 8<sup>th</sup> January between the hours of 15:00 to 18:00. Here, the local ward members (Victoria), in addition to local residents living nearby and consulted as part of PAC, were invited to review the accompanying plans and provide their views on the proposed development and make representations. Members of the design team were also in attendance to address any questions had by those in attendance.
- 4.13 Any person who wished to make representations about the proposed development must have completed a Consultation Response Form, either online or as a hard copy, and issued to Asbri Planning by the 20<sup>th</sup> January 2025.
- 4.14 Further information on the pre-application consultation undertaken, in addition to all responses received as part of the consultation, can be viewed in the accompanying PAC Report.

# Planning Policy Context

## Introduction

- 5.1 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *“public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”*.
- 5.2 The Well-being of Future Generations (Wales) Act 2015 plays a significant role in shaping the planning system in Wales, embedding sustainable development principles into planning policy and decisions. The Act reinforces the planning system’s shift towards a holistic, sustainable approach, emphasising that planning in Wales must consider not just present needs but also the well-being of future generations.
- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (adopted February, 2021); and
  - The Newport Local Development Plan 2011-2026 (adopted January 2015)
- 5.4 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:
- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
  - Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
  - Newport City Council Supplementary Planning Guidance, including:
- 5.5 This section of the Planning Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this planning application. For ease of review, this is set out below at the national and local level.

## National Level

### The Well-Being of Future Generations (Wales) Act 2015

- 5.6 The Act sets out seven ‘well-being’ goals as follows:
- A prosperous Wales:
  - A resilient Wales:
  - A healthier Wales:
  - A more equal Wales:
  - A Wales of cohesive communities:
  - A Wales of vibrant culture and thriving Welsh language:
  - A globally responsive Wales:
- 5.7 Within the Act, sustainable development is defined as follows: *“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”*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

### **National Development Framework: Future Wales – The National Plan 2040**

- 5.8 The *National Development Framework: Future Wales – the National Plan 2040* was published on 24<sup>th</sup> February 2021. 'Future Wales' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.
- 5.9 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, as follows:

#### *A Wales where people live:*

- 1 ...and work in connected, inclusive and healthy places
- 2 ...in vibrant rural places with access to homes, jobs and services
- 3 ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth
- 4 ...in places with a thriving Welsh Language
- 5 ...and work in towns and cities which are a focus and springboard for sustainable growth
- 6 ...in places where prosperity, innovation and culture are promoted
- 7 ...in places where travel is sustainable
- 8 ...in places with world-class digital infrastructure
- 9 ...in places that sustainably manage their natural resources and reduce pollution
- 10 ...in places with biodiverse, resilient and connected ecosystems
- 11 ...in places which are decarbonised and climate-resilient

### **Growth Strategy**

- 5.10 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

#### *Policy 1 – Where Wales will Grow*

*The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

- Cardiff, Newport and the Valleys
- Swansea Bay and Llanelli
- Wrexham and Deeside

- 5.11 As per Policy 33 of Future Wales, the application site is located within the 'Cardiff, Newport, and Valleys' National Growth Area. This states:

*"Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region.*

*Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.*

*The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage.*

Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance.

The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport.

The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys.

The Welsh Government supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region."

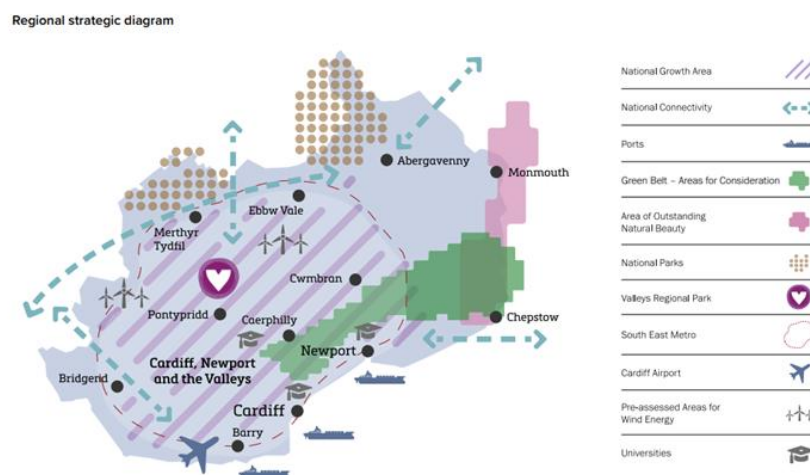


Figure 2: The Cardiff, Newport, and Valleys National Growth Area

5.12 It is further explained that *"Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources"* (page 60).

5.13 The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: *"Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being"* (page 60).

### Placemaking

5.14 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that *"Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration"*.

5.15 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

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

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

5.16 Further detail on the Welsh Government’s strategic placemaking priorities is set out at Page 66 of Future Wales. Key placemaking principles are summarised below:

#### *Mix of uses*

*To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods.*

#### *Variety of housing*

*To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.*

#### *Walkable scale*

*To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.*

#### *Density*

*To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.*

#### *Street network*

*To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.*

#### *Plot-based development*

*To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.*

#### *Green infrastructure*

*To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.*

#### *Biodiversity and Green Infrastructure*

- 5.17 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires *“an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable”* (page 76).

- 5.18 In addition to this, the associated importance of green infrastructure is highlighted:

*“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being”* (page 78).

- 5.19 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

#### *Policy 9 – Resilient Ecological Networks and Green Infrastructure*

*To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:*

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

#### *Transport*

- 5.20 Future Wales identifies that transport in Wales is currently dominated by the car and that *“our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people’s everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people’s health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation”* (page 85).

- 5.21 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *“to refuse*

*planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel” (page 85).*

### **Planning Policy Wales Edition 12**

- 5.22 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.
- 5.23 Sustainable Development is defined at Page 7 of PPW as follows: *“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”.*
- 5.24 Paragraph 1.18 sets out that *“Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated”.*

### **Placemaking**

- 5.25 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *“Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities”.*
- 5.26 It is summarised succinctly at Paragraph 2.3 that *“The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all”.*
- 5.27 Placemaking is defined at Page 14 of PPW as follows:
- “Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings”.*
- 5.28 A set of ‘national sustainable placemaking outcomes’ are outlined on page 17 PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:

- **Creating and Sustaining Communities**
  - *Enables the Welsh language to thrive*
  - *Appropriate development densities*
  - *Homes and jobs to meet society’s needs*
  - *A mix of uses*
  - *Offers cultural experiences*
  - *Community based facilities and services*
- **Making Best Use of Resources**
  - *Makes best use of natural resources*
  - *Prevents waste*
  - *Prioritises the use of previously developed land and existing buildings*
  - *Unlocks potential and regenerates*
  - *High quality and built to last*

- *Maximising Environmental Protection and Limiting Environmental Impact*
  - *Resilient biodiversity and ecosystems*
  - *Distinctive and special landscapes*
  - *Integrated green infrastructure*
  - *Appropriate soundscapes*
  - *Reduces environmental risks*
  - *Manages water resources naturally*
  - *Clean air*
  - *Reduces overall pollution*
  - *Resilient to climate change*
  - *Distinctive and special historic environments*
- *Growing Our Economy in a Sustainable Manner*
  - *Fosters economic activity*
  - *Enables easy communication*
  - *Generates its own renewable energy*
  - *Vibrant and dynamic*
  - *Adaptive to change*
  - *Embraces smart and innovative technology*
- *Facilitating Accessible and Healthy Environments*
  - *Accessible and high quality green space*
  - *Accessible by means of active travel and public transport*
  - *Not car dependent*
  - *Minimises the need to travel*
  - *Provides equality of access*
  - *Feels safe and inclusive*
  - *Supports a diverse population*
  - *Good connections*
  - *Convenient access to goods and services*

5.29 It is highlighted at Paragraph 2.20 that *“Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being”.*

5.30 The implications of COVID are highlighted in Paragraph 2.22, stating for example that *“We must ensure that a post-Covid world has people’s well-being at its heart. Planning Policy Wales leads the way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner”.*

### **Good Design**

5.31 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area”.*

5.32 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *“This includes making provision to meet the needs of people*

*with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”.*

- 5.33 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *“Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution”.*

- 5.34 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8:

*“Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places”.*

- 5.35 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. It is stated that *“Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate”.*

#### **Welsh Language**

- 5.36 It is set out in PPW that the Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. Paragraph 3.29 states that *“If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language”.*

#### **Sustainable Transport**

- 5.37 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:

- *“are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods;*  
*and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling”.*

- 5.38 Paragraph 4.1.11 summarises that: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services”.*

- 5.39 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.13 sets out that *"The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport"*.

#### **Active Travel**

- 5.40 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that *"Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice"*.

#### **Public Transport**

- 5.41 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *"by locating development where there is, or can be, good access by public transport"*.

#### **Green Infrastructure**

- 5.42 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 that *"The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places"*.

#### **Sustainable Drainage Systems (SuDS)**

- 5.43 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *"The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development"*. It is advised at Paragraph 6.6.19 that *"Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified"*.

#### **Technical Advice Notes**

- 5.44 The following Technical Advice Notes (TANS) are of relevance to the proposed development:

##### Technical Advice Note 2 (2006): Affordable Housing

- 5.45 TAN 2 provides advice and guidance on Planning and Affordable Housing and defines 'affordable housing' as housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.
- 5.46 TAN 2 confirms that "it is important that authorities have an appreciation of the demand for different dwelling sizes and types of housing (i.e. intermediate and social rented) in relation to supply so that they can negotiate appropriate mixes on new sites".
- 5.47 Paragraph 8.1 of TAN 2 states "Local planning authorities should ensure that development plan policies are based on an up-to-date assessment of the full range of housing requirements across the plan area over the plan period."

##### Technical Advice Note 5 (2009): Nature Conservation and Planning

- 5.48 TAN5 seeks to ensure that new developments should contribute to biodiversity conservation. It stipulates that planning system should respect designated and protected sites and incorporate wildlife and geological features within the design of development and green infrastructure.

Technical Advice Note 12 (2016): Design

- 5.49 In defining notion of design, Paragraph 2.1 states that it can help in articulating our nation and culture whilst helping in sustaining a positive image of Wales. Paragraph 2.5 warns that 'good design is not inevitable', in order to achieve it, it must embrace sustainability, architecture, place making, public realm, landscape, and infrastructure. Furthermore, the five objectives of good design are highlighted;

- Access;
- Character;
- Community Safety;
- Environmental Sustainability; and
- Movement

Technical Advice Note 24 (2014): The Historic Environment

- 5.50 TAN24 provides guidance on the role that heritage contexts can have on new development. It provides specific guidance on how the following heritage assets should be considered when formulating and determining development proposals:

- "World Heritage Sites;
- Scheduled Monuments;
- Archaeological Remains;
- Listed Buildings;
- Conservation Areas;
- Historic Parks and Gardens;
- Historic Landscapes;
- Historic Assets of Special Local Interest;"

**Local Level**

- 5.51 The Newport Local Development Plan was adopted by Newport City Council in January 2015 and comprises part of the prevailing development plan for the area for the period 2011-2026.
- 5.52 The Local Development Plan Proposals Map indicates that the site is allocated for housing development under LDP allocation reference H1(64) 'Uskside Paint Mills', for the delivery of a maximum of 53no. housing units. As such, it is considered that the site is considered to be acceptable for residential development subject to compliance with all national and local development plan policies.

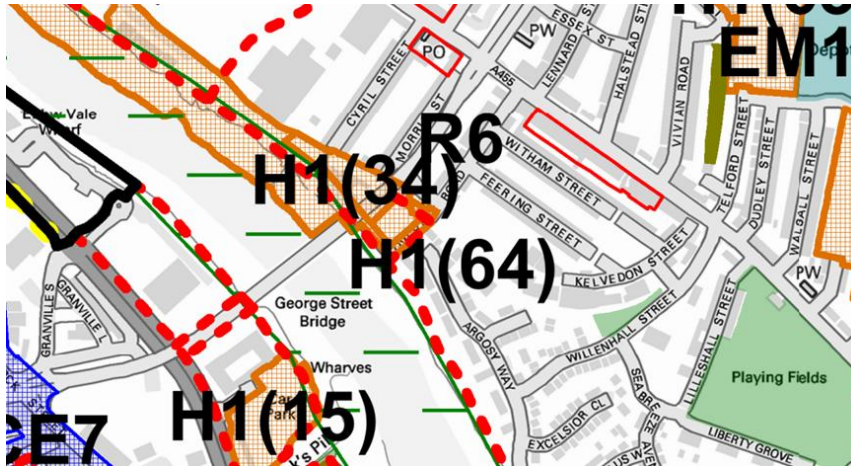


Figure 3: Newport LDP Proposals Map Extract

5.53 The following Local Development Plan policies are considered relevant in the context of the proposed development:

| Policy Reference            | Relating To                                                  |
|-----------------------------|--------------------------------------------------------------|
| <i>Strategic Policies</i>   |                                                              |
| SP1                         | Sustainability                                               |
| SP2                         | Health                                                       |
| SP3                         | Flood Risk                                                   |
| SP4                         | Water Resources                                              |
| SP9                         | Conservation of the Natural, Historic, and Built Environment |
| SP10                        | House Building Requirement                                   |
| SP13                        | Planning Obligations                                         |
| <i>General Policies</i>     |                                                              |
| GP1                         | General Development Principles (GDP) – Climate Change        |
| GP2                         | GDP – General Amenity                                        |
| GP4                         | GDP – Highways and Accessibility                             |
| GP5                         | GDP – Natural Environment                                    |
| GP6                         | GDP – Quality of Design                                      |
| GP7                         | GDP – Environmental Protection and Public Health             |
| <i>Environment Policies</i> |                                                              |
| CE2                         | Waterfront Development                                       |
| CE3                         | Environmental Spaces and Corridors                           |
| CE5                         | Locally Listed Buildings and Sites                           |

*Housing*

|                  |                                          |
|------------------|------------------------------------------|
| H1               | Housing Sites                            |
| H2               | Housing Standards                        |
| H3               | Housing Density                          |
| H4               | Affordable Housing                       |
| <i>Transport</i> |                                          |
| T4               | Parking                                  |
| T7               | Public Rights of Way and New Development |

5.54 **Policy SP1 ‘Sustainability’** of the Newport Local Development Plan advises that new development proposals must make a positive contribution to sustainable development by concentrating development in sustainable locations, on brownfield sites located within the settlement boundary. Proposals will be assessed on (inter alia) their efficient use of land, the reuse of previously developed land, how they look to reduce waste, their connectivity to integrated transport, and their impact on the local heritage and natural landscape.

5.55 **Policy SP2 ‘Health’** states:

*“Development proposals should seek to maximise their positive contribution to health and well-being, and minimise any negative effects by being located in the most sustainable locations, close to public transport links and providing efficient walking and cycling routes and other green infrastructure as part of development schemes.”*

5.56 With regard to flood risk and new development, **LDP Policy SP3 ‘Flood Risk’** stipulates:

*“Newport’s coastal and riverside location necessitates that development be directed away from areas where flood risk is identified as a constraint and ensure that the risk of flooding is not increased elsewhere. 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.”*

5.57 **Policy SP4 ‘Water Resources’** relates to the protection of, and minimised use of water resources, and states:

*“Development proposals should minimise water consumption, protect water quality during and after construction and result in no net increase in surface water run-off through the sustainable management of water resources by:*

- i) the use of sustainable drainage systems;*
- ii) the reuse of water and reduction of surface water run-off through high quality designed developments;*
- iii) careful consideration of the impact upon finite water resources, particularly in terms of increased pressures on abstraction and the impact of climate change. iv) ensuring development is appropriately located and phased so that there is capacity in the waste water, sewerage and water supply as well as the protection of water quality.”*

5.58 **Policy SP9 ‘Conservation of the Natural, Historic and Built Environment’** states that *“the conservation, enhancement, and management of recognised sites within the natural, historic, and built environment will be sought in all proposals.”*

5.59 The Council state that provision is made for 11,623 units across the development plan period, as per **Policy SP10 ‘House Building Requirement’**. In full, this states:

*“Provision is made for 11,623 units to deliver a housing requirement of 10,350 units over the plan period. The affordable housing target for the plan period is set at 2,061 units. The land will be provided primarily on previously developed land in the following ways:*

- i) sites with planning permission, including sites under construction;*
- ii) the eastern expansion area;*
- iii) allocations set out in policy h1; and*
- iv) infill, windfall and small sites.”*

5.60 **Policy SP13 ‘Planning Obligations’** states that new development will be required to contribute to the delivery of sustainable communities through making contributions to local and regional infrastructure. This includes contributions to (inter alia) educational facilities, affordable housing, the local highway network, outdoor recreation, community facilities, and the public realm.

5.61 **Policy SP18 ‘Urban Regeneration’** advises:

*“Proposals will be favoured which assist the regeneration of the urban area, particularly where they contribute to:*

- i) the vitality, viability and quality of the environment of the city centre;*
- ii) the provision of residential and business opportunities within the urban area;*
- iii) reuse of vacant, underused or derelict land;*
- iv) encourage the development of community uses where appropriate.”*

5.62 The Council’s approach to preventing the impacts of climate change for new development is set out within **Policy GP1 ‘General Development Principles – Climate Change’**. This states:

*“Development proposals should:*

- i) be designed to withstand the predicted changes in the local climate and to reduce the risk of flooding on site and elsewhere by demonstrating where appropriate that the risks and consequences of flooding can be acceptably managed, including avoiding the use of non-permeable hard surfaces;*
- ii) be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where practicable;*
- iii) be designed to reuse or recycle existing construction materials present on the site;*
- iv) meet the relevant breem or code for sustainable homes level.”*

5.63 Regarding new development and the potential impacts generated on amenity, **Policy GP2 ‘General Development Principles – General Amenity’** states:

*“Development will be permitted where, as applicable:*

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

5.64 **'Policy GP4 General Development Principles – Highways and Accessibility'** advises:

*"Development proposals should:*

- i) *provide appropriate access for pedestrians, cyclists and public transport in accordance with national guidance;*
- ii) *be accessible by a choice of means of transport;*
- iii) *be designed to avoid or reduce transport severance, noise and air pollution;*
- iv) *make adequate provision for car parking and cycle storage; v) provide suitable and safe access arrangements;*
- v) *design and build new roads within private development in accordance with the highway authority's design guide and relevant national guidance;*
- vi) *ensure that development would not be detrimental to highway or pedestrian safety or result in traffic generation exceeding the capacity of the highway network."*

5.65 Local Development Plan **Policy GP5 'General Development Principles – Natural Environment'** states that development will be permitted where, as applicable:

- i) *"the proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including through the incorporation of new features on or off site to further the UK, Welsh and/or Newport biodiversity action plans;*
- ii) *the proposals demonstrate how they avoid, or mitigate and compensate negative impacts to biodiversity, ensuring that there are no significant adverse effects on areas of nature conservation interest including international, European, national, Welsh section 4232 and local protected habitats and species, and protecting features of importance for ecology;*
- iii) *the proposal will not result in an unacceptable impact on water quality; iv) the proposal should not result in the loss or reduction in quality of high quality agricultural land (grades 1, 2 and 3a);*
- iv) *there would be no unacceptable impact on landscape quality;*
- v) *the proposal includes an appropriate landscape scheme, which enhances the site and the wider context including green infrastructure and biodiversity networks;*
- vi) *The proposal includes appropriate tree planting or retention where appropriate and does not result in the unacceptable loss of or harm to trees, woodland or hedgerows that have wildlife or amenity value."*

5.66 **Policy GP6 'General Development Principles – Quality of Design'** sets out how new development should respond to good, high quality design. It states that new development should consider fundamental design principles, including (inter alia) the site's context, access, layout, and permeability, scale and massing, sustainable materials, and efficient use of energy and natural resources.

5.67 **Policy GP7 'General Development Principles Environmental Protection and Public Health'** advises:

*"Development will not be permitted which would cause or result in unacceptable harm to health because of land contamination, dust, instability or subsidence, air, heat, noise or light pollution, flooding, water pollution, or any other identified risk to environment, local amenity or public health and safety."*

- 5.68 Given the site's proximity to the River Usk, **Policy CE2 'Waterfront Development'** is considered pertinent. This states:

*"Development in a waterside location should integrate with the waterway and not turn its back on it, and should take account of the interests of regeneration, leisure, navigation, water quality and flow, and nature conservation."*

- 5.69 Similarly, **Policy CE3 'Environmental Spaces and Corridors'** is considered to be of relevance given the nature of the proposals. This advises:

*"In and adjoining the urban and village areas, and in areas identified for comprehensive development, sites having existing importance for their visual qualities, as wildlife habitats or for recreational or amenity purposes, will be safeguarded as "environmental spaces and corridors". Development in these spaces will be permitted only where:*

- i) the existing or potential environmental qualities of the site will be improved or complemented;*
- ii) there is no adverse impact on international, European, national, regional or local nature conservation interest;*
- iii) there is not a loss, without appropriate replacement, of a recreational, open space, or amenity resource for the immediate locality unless it can be demonstrated that there is an excess of provision or facilities can be enhanced through development of a small part of the site.*

*Proposals to enhance or improve existing environmental space provision will be encouraged where practicable. Additional provision will be sought in areas where a deficit has been identified."*

- 5.70 Given the site's proximity to the Grade II\* Listed George Street Bridge, LDP **Policy CE5 'Locally Listed Buildings and Sites'** is of high relevance. This states:

*"Buildings and sites of local significance for their architectural or historic interest will be included on a local list and should be protected from demolition or inappropriate development."*

- 5.71 As established, the application site is an identified housing allocation under reference 'H64', as written in **Policy H1 'Housing Sites'**.

- 5.72 **Policy H2 'Housing Standards'** of the Newport LDP states that *"residential development should be built to high standards of environmental and sustainable design, taking into account the whole life of the dwelling."*

- 5.73 On housing density, **Policy H3 'Housing Mix and Density'** advises:

*"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. A lower density will only be acceptable where it is demonstrated:*

- i) physical or infrastructure constraints prevent the minimum density from being reached, or;*

- ii) *the minimum density would have an unacceptable impact on design/character of the surrounding area, or;*
- iii) *there is a particular lack of choice of housing types within a local community."*

5.74 As the proposal comprises the development of affordable housing, **Policy H4 'Affordable Housing'** is considered to be of relevance to the determination of the proposals. This advises:

*"On-site provision of affordable housing will be required on all new housing sites of 10 or more dwellings within the settlement boundary, or 3 or more dwellings within the defined village boundaries.*

*The authority will seek the provision of affordable housing in accordance with the relevant submarket area target noted below;*

*40% Caerleon and rural Newport*

*30% Rogerstone and west Newport*

**20% East Newport**

*10% Malpas and Bettws (the submarket areas are defined on the affordable housing submarket area plan overleaf)*

*Specific site targets may vary subject to viability and negotiation.*

*For new housing sites of fewer than 10 dwellings within the settlement boundary, or fewer than 3 dwellings within the defined village boundaries, the council will seek a commuted sum contribution. The affordable housing SPG clarifies the methodology for calculating the commuted sum payments."*

5.75 Regarding transport, **Policy T4 'Parking'** states *"development will be required to provide appropriate levels of parking, within defined parking zones, in accordance with adopted parking standards [SPG]."*

5.76 As established, a Public Right of Way (PRoW) runs along Coverack Road to the south of the site, before joining onto the riverside walkway along the banks of the River Usk. **Policy T7 'Public Rights of Way and New Development'** states:

*"Any public footpath, bridleway or cycleway affected by development proposals will require retention or the provision of a suitable alternative. Provision of additional routes, where appropriate, will be sought in new developments, with linkages to the existing network."*

#### **Supplementary Planning Guidance**

5.77 The following Supplementary Planning Guidance (SPG) adopted by Newport City Council is of relevance to the proposed development:

- Air Quality SPG (Adopted February 2018)
- Affordable Housing SPG (Adopted October 2021)
- New Dwellings SPG (Adopted January 2010)
- Parking Standards SPG (Adopted August 2015)
- Sustainable Travel SPG (Adopted July 2020)
- Trees, Woodland, Hedgerows and Development Sites SPG (Adopted January 2017)
- Wildlife and Development SPG (Adopted August 2015).

# Appraisal

## Overview

- 6.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the policies of the Newport Local Development Plan 2011-2026.
- 6.2 The key material planning considerations are as follows:
- The **Principle of Development**
  - **Scale, Layout & Design**
  - Impact on **Ecology and Landscape**
  - Impact on the **George Street Bridge (Heritage)**
  - **Parking** and other **Highway Matters**
  - **Public Open Space**

## The Principle of Development

- 6.3 As established, the application site is located within the defined settlement boundary for Newport, and comprises previously developed 'brownfield' land which is allocated for new residential development as per allocation reference H64 'Uskside Paint Mills'.
- 6.4 The redevelopment of the site therefore complies with Local Development Plan Policy SP1 'Sustainability', which favours development on brownfield sites in the interest of wider, sustainable growth. The site remains an un-developed, allocated site within a strategic area of Newport and the proposed development is considered to contribute to the continued growth and regeneration along the city's Waterfront area along the River Usk.
- 6.5 Whilst the NRW Development Advice Map for Flooding indicates that the application site is located within Zone B 'areas known to have flooded in the past', the Flood Map for Planning (NRW), which is based on more recent flood modelling, indicates that the site is not at risk of river or surface water flooding.
- 6.6 On the matter of affordable housing, LDP Policy SP10 'Housebuilding Requirement' advises that provision is made for approximately 2,061 affordable units through the allocations of the LDP and identified sites which are subject to planning permission. Policy H4 'Affordable Housing' of the LDP confirms that developments proposing 10+ units in the defined East Newport area should achieve an affordable housing provision of 20%. In the case of this planning application, a provision of 100% affordable housing would be delivered and as such the proposal is considered to be fully compliant with Policy H4, in addition to Policy SP10 as the proposed provision would contribute towards achieving Newport City Council's ambitions to deliver 2,061 affordable units during the development plan period (2011-2026).
- 6.7 As previously established, the application site has been subject to extensive pre-application discussions with Newport City Council which have confirmed that the proposed development is acceptable in principle.
- 6.8 The site's vacant and disused context has consequently generated a number of issues in recent years associated with vandalism, antisocial behaviour, and general misuse. It is therefore considered that the proposed development will ensure that the site is delivered for a use which would improve the site's

immediate vicinity and ensure the continued regeneration of the riverside area. Accordingly, it is considered that the proposals detailed within this pre-application enquiry accord with the aspirations set out in Policy SP18 'Urban Regeneration' and CE2 'Waterfront Development' within the Newport Local Development Plan and that the principle of development can be established, subject to accordance with all other pertinent Local Development Plan policies.

### **Scale, Layout and Design**

- 6.9 The accompanying architectural plans, including the proposed layout plan, shows how the proposed development is to sit within the wider context of the 'Phase 1' development along Coverack Road and along the banks of the River Usk. The proposed plans submitted indicate that the proposals serve as a logical extension and comprise a 'finishing off' approach to residential development along the river within the centre of Newport. As such it is considered to make effective use of the site, adopting a perimeter approach and taking the site's constraints into fundamental consideration.
- 6.10 The proposals indicate one block comprising 40no. residential apartments across a height of five storeys. This has been formulated with regard to previous pre-application discussions (with concerns on scale and density previously raised in respect of a 6 storey development in the past) and with reference to similar developments along the River Usk, including the first phase of residential development along Coverack Road.
- 6.11 As established, Policy CE2 'Waterfront Development' advises that waterside development should front onto Newport's waterways, and should not turn its back on the waterside location. As established, the proposed development seeks to adopt an active frontage onto the River Usk and contribute towards the vitality of this area of Newport.
- 6.12 With regard to connectivity, the proposed layout indicates that car parking spaces are provided along the sites northeastern and northwestern boundaries, cumulating in a total of 32no. car parking spaces (discussed further in the relevant Highways subheading within this section). It is also proposed to develop pedestrian links around the site's perimeter and connect to the footpaths approved by virtue of the 'Phase 1' consent permitted under 18/1169.
- 6.13 In order to achieve high quality landscape design, perimeter hedgerows are proposed along the site's northern, western, and southern boundaries (in addition to similar hedgerows to the east of the site). This is considered to compliment the proposal's wider landscaping strategy, which also includes the planting of native and non-native trees and shrubbery, in addition to the installation of amenity turfing surrounding the proposed residential block. As such, the proposed development is considered to comply with the aims and policies set out within the Newport Local Development Plan relating to securing high-quality design.
- 6.14 As established, the materials selected have been carefully chosen to be sustainable and long lasting with minimum maintenance whilst still providing a visually significant appearance which is similar to previous waterfront development at Tramway and Bankside House.
- 6.15 In line with the above, it is considered that the proposed development achieves high-quality, sustainable design, and is of an appropriate scale and massing which incorporates a functional layout which will result in a high quality waterside development for the benefit of future occupiers. Accordingly, it is considered that Local Development Plan Policies SP1 'Sustainability', GP1 'General Development Principles – Climate Change', GP2 'General Development Principles – General Amenity', GP6 'General Development Principles – Quality of Design', and CE2 'Waterfront Development'.

### **Impact on Ecology & Landscape**

- 6.16 As indicated in the submitted Preliminary Ecological Appraisal (PEA) (JBA), the application site runs adjacent to the River Usk SSSI and SAC, leading to a recommendation for a Habitat Regulation Assessment (HRA).
- 6.17 The PEA concludes that the proposed development will result in the small-scale loss of poor-quality open mosaic habitats, which are defined as previously developed land and mixed scrub.
- 6.18 The accompanying HRA confirms that, with appropriate mitigation measures, the development will not adversely impact the qualifying features of the River Usk SSSI and SAC, nor the Severn Estuary SAC, SPA, and Ramsar site.
- 6.19 As outlined in Policy GP5 'General Development Principles – Natural Environment,' new development should be designed to protect and encourage biodiversity and ecological connectivity, avoiding or mitigating negative impacts on biodiversity.
- 6.20 The proposed development does not involve the removal of any trees. The accompanying landscaping scheme introduces a range of measures to enhance biodiversity and landscape quality in line with the Environment (Wales) Act 2016. The proposed hedgerow and shrub plantings, along with trees planted along the north-west boundary, will provide opportunities for biodiversity growth and help reduce visibility from multiple locations along Coverack Road, contributing significantly to biodiversity enhancement.
- 6.21 The development has been designed with careful consideration of its potential impact on ecology and Green Infrastructure, aiming to enhance biodiversity. The landscaping incorporates both native and non-native species, including trees such as Hornbeam, Field Maple, and Sweetgum, along with shrubs like Japanese Laurel, Aztec Pearl Mexican Orange Blossom, and Rakai's Hebe, which support local wildlife and create a multi-layered landscape. This planting strategy also enhances biodiversity and provides visual screening from Coverack Road.
- 6.22 The bio-retention basin integrated into the site design will play a key role in both stormwater management and biodiversity enhancement. Moisture-loving plants such as Fool's Water-cress, Sharp-angled Sedge, and Yellow Flag Iris will absorb excess rainwater, filter pollutants, and reduce erosion, while providing habitats for aquatic insects, amphibians, and birds.
- 6.23 The development complies with local and national planning policies, including the Environment (Wales) Act 2016, Planning Policy Wales (12th Edition), and the Newport Local Development Plan, all of which emphasize the importance of protecting and enhancing biodiversity. The proposed landscaping strategy ensures year-round coverage, providing shelter, food, and nesting opportunities for wildlife, and incorporates sustainable drainage systems (SUDS) to support water management and ecosystem resilience.
- 6.24 In conclusion, the proposed development is expected to contribute positively to local ecology by enhancing biodiversity, supporting wildlife, and integrating Green Infrastructure elements that promote sustainability. The design addresses potential environmental concerns, complies with relevant policies, and enhances the landscape's quality and the amenity value for the surrounding community.
- 6.25 The development is considered to comply with Local Development Policies SP1 'Sustainability', GP5 'General Development Principles – Natural Environment', and CE2 'Waterfront Development' of the

Newport Local Development Plan (2011-2026), as well as the overarching goals and policies of Future Wales and PPW (12th Edition).

### **Impact on the George Street Bridge (Heritage)**

- 6.26 As set out throughout this planning statement, the application site is located adjacent to the Grade II\* George Street Bridge, which sits to the site's north-western boundary and runs across the River Usk.
- 6.27 Accordingly, due consideration is required regarding any potential heritage impacts generated onto the setting of the heritage asset, in accordance with Policies SP9 'Conservation of the Natural, Historic, and Built Environment' and CE5 'Locally Listed Buildings and Sites'.
- 6.28 Local Development Plan Policy SP9 'Conservation of the Natural, Historic, and Built Environment' states that *"the conservation, enhancement, and management of recognised sites within the natural, historic, and built environment will be sought in all proposals."*
- 6.29 In addition, LDP Policy CE5 'Locally Listed Buildings and Sites' advises that *"Buildings and sites of local significance for their architectural or historic interest will be included on a local list and should be protected from demolition or inappropriate development."*
- 6.30 The accompanying Archaeological and Heritage Impact Assessment (EDP) has been prepared and concludes that the proposed development would be the lowest residential development adjacent to the designated historic asset" and "would not compete with the height, scale or prominence of the bridge". In addition, it also states that the proposed development is of a sympathetic design that would be in-keeping with recent developments along the River Usk, which are also in close proximity to the River Usk including Bankside House.
- 6.31 As set out previously within this planning statement, the proposed development has been subject to considerable pre-application discussion with Newport City Council's Heritage Officer, with concerns raised regarding the potential impact of the development on the adjacent George Street Bridge.
- 6.32 In these discussions, the Council stated that they would require a 'very thorough and robust justification' arrived at under the methodologies set out in Cadw's guidance, Conservation Principles for the sustainable management of the historic environment in Wales (CP; Cadw, 2011) and Setting of Historic Assets in Wales (SHAW; Cadw, 2017) to support the conclusions reached in the Archaeological and Heritage Assessment.
- 6.33 The accompanying Archaeological and Heritage Assessment (EDP) identifies that the proposed development would have the *potential* to affect the setting of the Grade II\* Listed George Street Bridge, and Grade I Listed Newport Transporter Bridge, based on assessments in line with Cadw 2017b setting assessment guidance.
- 6.34 A revised assessment of the proposed development and potential impact on the George Street Bridge was undertaken following discussions had with the LPA and Heritage Officer. This is set out clearly within the accompanying Archaeological and Heritage Assessment.
- 6.35 The Archaeological and Heritage Assessment concludes that the proposed development would sit within the setting of the Grade II\* Listed bridge but that it would represent a neutral element of its setting that would not result in any adverse loss of its significance. Furthermore, it is concluded that the development of the site would result in the loss of an area that presently represents a negative element of the setting of the bridge, which detracts from its significance to a low degree. It also concludes that the provision of a heritage information board would further aid the interpretation of the asset to the public and would result in an additional minor benefit to the significance of the bridge. It also concludes that the proposed

development has the potential to affect an incidental, partial, and limited view of the Grade 1 Listed Transporter Bridge, in line with Cadw 2017b setting guidance.

- 6.36 Moreover, it concludes that the development of the site would result in the loss of an area which is considered to represent a significantly negative setting on the George Street bridge, which currently detracts from the significance of the bridge.
- 6.37 No other designated heritage assets are identified to have the potential to have their setting or significance affected by the proposed development. Given the site's archaeological context, there is low potential for the discovery of significant archaeological remains.
- 6.38 As set out in the Proposals section, it is proposed to develop the provision of a heritage information board in the vicinity of the George Street Bridge, following discussions had with the LPA and Heritage Officer. This would further improve the interpretation of the heritage asset to the general public, resulting in a minor benefit being generated to the bridge's significance.
- 6.39 It should also be noted that Bankside House (permitted under 18/1169), a six storey residential block which fronts onto the River Usk and is of a similar, yet more excessive scale to the proposals submitted, is located approximately 3.0m from the George Street Bridge than the proposed development.
- 6.40 Regarding 18/1169, the Council's Heritage Officer and planning committee concluded that the six-storey scale of Bankside House would *"respect the setting of the bridge and its surroundings"*. Regarding the nature of waterfront development within this immediate vicinity, the committee advised the following:

*"The Riverfront is fast developing into a modern and contemporary feature of the City which is promoted by urban regeneration aspirations. It is considered that the siting of modern buildings adjacent to the bridge on the west bank of the river has not detracted from the setting or presence of the bridge as a listed structure and as a well-known feature of central Newport. The proposed development is considered to be an improvement compared to the current poor-quality buildings."*

- 6.41 In line with the above, it is considered that clear evidence and justification is provided, illustrating that the proposed development would not generate any significant, adverse impacts on the setting of the Grade II\* Listed George Street Bridge or the Grade 1 Listed Newport Transporter Bridge. The proposals would result in the redevelopment of a site which currently negatively impacts the setting of the bridge, and would also result in an additional minor benefit being generated through the provision of an information board within the vicinity of the George Street Bridge for the benefit of the general public.
- 6.42 As such, it is considered that the proposed development does not contravene Local Development Plan Policies SP9 'Conservation of the Natural, Historic, and Built Environment', and CE5 'Locally Listed Buildings and Sites'.

#### **Parking and other Highway Matters**

- 6.43 As established, the application site is located in what is considered to be a sustainable location with regard to public transport and active travel near the centre of Newport.
- 6.44 Policy T4 'Parking' of the Newport Local Development Plan states that *"development will be required to provide appropriate levels of parking, within defined parking zones, in accordance with the adopted parking standards."*
- 6.45 A review of Newport City Council's Parking Standards SPG (2015) indicates that the application site is located within Parking Zone 3, where new residential (inclusive of apartment) developments should deliver

a maximum of 1 car parking space per bedroom proposed for resident use. As for visitor car parking provision, the SPG advises that 1 space per 5 units should be achieved. In line with the guidance stipulated within the SPG, the proposed development should, in principle terms, provide a maximum of 58no. car parking units.

- 6.46 Notwithstanding, the SPG advises that a sustainability assessment should be completed to reduce car parking requirements in suitable locations for new development.
- 6.47 The accompanying sustainability assessment identifies that the site scores 10 sustainability points, which allows a reduction of 2no. spaces per dwelling in line with the guidance for Zone 3 locations. The guidance also states that reductions from a sustainability assessment are not applicable to one-bedroom apartment units, meaning in this instance the only reductions applicable are on the two-bedroom units proposed.
- 6.48 Applying a reduction in line with the guidance and sustainability assessment undertaken, the maximum car parking requirement for the proposed development is 48no. parking units.
- 6.49 As established within the proposals section, the development proposals comprise the delivery of 32no. car parking units, inclusive of resident and visitor use. This is proposed with regard to the guidance written within the SPG, along with other material considerations which are of relevance and set out comprehensively within the Transport Statement and Travel Plan and summarised as follows:

- Phase 1 of residential development on Coverack Road delivered 76 apartments - 47no. 1 bedroom flats and 29no. 2 bedroom flats. Following submission of sustainability assessment and supporting evidence, 77 spaces, 76 for residents and a single visitor space was considered acceptable.
- Acstro have completed a parking survey of phase 1 which confirms that 46 cars were parked within the site on the 6th March and 49 cars on 7th March. Based on there being 76 apartments, this confirms that there is a current parking demand of 0.64 spaces per flat. When considering both phases together, the scheme will deliver 116 flats with 109 car parking spaces which equates to 0.94 spaces per flat, which 13 comfortably exceed the parking demand if the existing rate is applied across both phases. The site would house single occupants from the councils housing register and statistics confirm that this demographic/house type have a far lower car ownership rate;
- Asbri Planning have recently been involved in an appeal decision (See appendix A) where the redevelopment of a former Church Site in Crosskeys, Newport was allowed and provided 0 parking provision for 16 flats. This site has many similar attributes to the site in Crosskeys, indeed by comparison it has a far greater sustainability baseline. The inspector commented in their determination:

*"The proximity of the proposal to shops, facilities, public transport, including a rail station that provides an hourly service to Cardiff, would invariably be attractive to non-car owning occupants, and would promote car free travel for the occupants of the development" "the proposal would comply with the Council's affordable housing policies, and it is entirely reasonable in my view to expect that the flatted nature of the development, 11 flats of which are small one-bedroom units, would be attractive to low-income occupants unlikely to own a car" "I accept that this is not a city centre location or a major town, nonetheless Crosskeys has a choice of facilities and services, and good access to public transport. This would support less reliance on the private car, consistent with the aims of Future Wales (FW) and Planning Policy Wales Edition 11 (PPW)."*

- The Council's car parking SPG is now 9 years old and superseded by national policy that is far more pro-development which seeks to reduce reliance on the private car as per the arguments presented in the above mentioned appeal decision.
- 6.50 The proposed parking area for 32no. spaces will be accessed from the existing access road to the north, and will be link into the existing parking area for 'Phase 1', which contains 76 car parking spaces. These proposed spaces will be developed in accordance with the appropriate parking guidance on space length and width.
- 6.51 With regard to bicycle parking, a total of 25no. covered bicycle parking spaces are proposed through the provision of a two-tiered parking stand. Short-stay bicycle parking stands are also proposed in order to accommodate visitor parking. This has been designed in accordance with the Sustainable Travel SPG (2020) which sets out bicycle parking requirements for new development, stating that new residential development should provide 1no. secure long-stay space per two bedrooms and 1no. short-stay space per 20 bedrooms.
- 6.52 In line with the above matters and justification set out, it is considered that the proposed development is in accordance with local planning policy and supplementary guidance on parking standards, and that the proposed provision of car and bicycle provision is acceptable.
- 6.53 As established, the proposed development comprises the use of Coverack Road to facilitate access into the site boundary. This is of an appropriate standard in terms of width and paving, and is considered acceptable to provide. The accompanying Transport Statement and Travel Plan demonstrate that Coverack Road can continue to appropriately provide safe, secure access into the site boundary and serve both 'Phases' of residential development at Coverack Road.
- 6.54 As such, it is considered that the proposed development is acceptable from a highways and parking perspective, and that local and national planning policy, including LDP Policy T4 'Parking', and the relevant guidance.

### **Public Open Space (POS)**

- 6.55 Newport City Council's adopted New Dwellings SPG (February 2019) confirms that new dwellings should be afforded private amenity space in accordance with the table provided in para 5.2.1 of the SPG. As the proposals look to deliver individual balconies for all flats proposed, the proposals are considered to comply with the SPG in this regard.
- 6.56 Regarding new communal amenity space, new proposals should be in accordance with the table provided within para 5.3.3 of the SPG. Based on the number of occupants, the proposed development should, in principle, provide a 11m<sup>2</sup> of community amenity space per occupant (based on the proposed occupancy of 90 residents),
- 6.57 A review of a number of planning committee reports confirms that Newport City Council take a holistic approach when assessing planning applications and their compliance within the guidance set out within the New Dwellings SPG. Whilst it is recognised that each application is, and should be assessed on its own merit, some notable cases can be found within application refs: 22/1033, 22/0576, and 21/1106.
- 6.58 The officer's report for 22/1103 acknowledged that there was limited opportunity within the site boundary to deliver amenity space, with the Officer's report stating *"there is little point in providing space that would not be attractive to or used by residents....The existing established park opposite the site is a much more attractive feature and even if space were provided on site, this park would likely prove a much more engaging and peaceful space for future residents"*.

- 6.59 The officer's report also notes; *"The provision of balconies is in accordance with the Council's New Dwellings SPG and is a key part of the acceptability of the scheme in this instance given the limited opportunity for usable communal space on the site."*
- 6.60 The site's limitations on the footprint of the site means that no communal amenity space is proposed as part of this application. Notwithstanding, similar to the proposals and limitations of 22/1103 and 21/1106, the application site is located in a sustainable, positive context with regard to nearby areas of open space, including Primary Walk/Coverack Road along the River Usk, in addition to Lysaghts Park (located approx. 470m to the east of the site),
- 6.61 With regard to 22/0567, the proposals comprise private balconies for all 40 of the units proposed, and it is requested that a balance consideration is given to the proposals, owing to the regeneration benefits which come with the redevelopment of the site through the development of affordable homes on a brownfield site near Newport's City Centre.
- 6.62 On balance, the provision of balconies as proposed is considered to be appropriate and that there are material considerations which weigh in favour of not delivering communal amenity space at this site.
- 6.63 In line with the above, it is considered that the proposals are compliant with regard to the guidance provided on open space provision and that the proposals do not contravene Policies SP1 'Sustainability', SP2 'Health', and GP2 'General Amenity' of the Newport Local Development Plan 2011-2026.

## Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Hedyn in relation to the proposed full planning application for the proposed residential development, with associated works, at land at Coverack Road, Newport.
- 7.2 The proposed development presents an opportunity for Hedyn to deliver much needed affordable housing provision in a sustainable location located near the centre of Newport, in an established river-side location on the banks of the River Usk. The proposed development will result in the delivery of a mix of housing tenure in a highly sought after area, where there is significant housing need whilst being in keeping with the residential context.
- 7.3 The application site is located within the defined settlement boundary for Newport, and is subject to an allocation for residential development as per the Newport Local Development Plan as per reference H1(64) 'Uskside Paint Mills'.
- 7.4 The development of the site would be delivered in a sympatric manner with adequate provisions for landscaping drainage infrastructure made, in addition to ecological and landscape enhancement as necessary. In line with national planning policy, design measures have been formulated with placemaking principles in mind, and it is considered that the principle of development behind the scheme is sustainable.
- 7.5 In light of the above, it is considered that the proposed development is in accordance with Key Local Development Plan policies including Policies SP1 'Sustainability', SP9 'Conservation of the Natural, Historic, and Built Environment', SP18 'Urban Regeneration', GP2 'General Amenity', GP6 'Quality of Design', CE2 'Waterfront Development', and H1 'Housing Sites', in addition to national planning policy, and is acceptable in regard to principle and detailed design matters.
- 7.6 The proposals therefore comply with the relevant national and development plan planning policies and supplementary planning guidance. It is for these reasons that it is respectfully requested that Newport City Council grant planning permission for the proposed development.