

From:

Sent: 20 April 2026 11:49

To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>

Subject: Planning Application 29/0099

We live at 12 Traston Avenue, Newport NP194TE

Please find attached our objections to planning application 26/0099.

We would request the following:

1. Confirmation of receipt of the attached document.
2. Confirm the process applied to the application and the timeframe.
3. If the application is to go to Planning Committee, what is the process for public representation at Planning Committee.

Sent from my iPad

OBJECTION TO NEWPORT CITY COUNCIL PLANNING APPLICATION 26/0099

We write to object to the above planning application. Our concerns relate to the specific impacts of this proposal on nearby residential amenity and to the content of the Design and Access Statement that underpins the application, the level of detail of the submission itself and the absence of technical assessments that all hinder a robust and policy-compliant assessment in relation to Planning Policy Wales (Edition 12) and the Newport City Council Local Development Plan (LDP) 2011–2026. (The development should be assessed against the Newport City Council Local Development Plan 2011–2026 (adopted January 2015), which remains the operative development plan for the area, as the Replacement LDP is not yet formally adopted).

COMMENTS ON THE PLANNING NOTICE CONTAINING THE WRONG ADDRESS FOR THE DEVELOPMENT

We are aware that the neighbour notification letters issued by Newport City Council described the development site using an incorrect address. As a result, we did not realise the proposal affected us. This is an experience shared by other residents, and as such representations were not made within the consultation period.

Given the proximity of residential properties and the site-specific nature of impacts such as noise, lighting and traffic, we are concerned that the consultation has not provided a fair opportunity for affected residents to engage.

We respectfully request that the Council re-consult affected neighbours using the correct site address and ensure that the officer report fully acknowledges and addresses this issue before the application is determined, in order that the decision making process does not rely on an incomplete or distorted picture of public impact.

COMMENTS RELATING TO THE DESIGN AND ACCESS STATEMENT (DAS) PRODUCED BY SPORTS LAB CONSULT

THE PURPOSE OF A DAS IS TO COMMUNICATE WHAT IS PROPOSED AND TO DEMONSTRATE THE DESIGN PROCESS THAT HAS BEEN UNDERTAKEN TO REACH THE FINAL PROPOSAL. IT SHOULD ALSO DEMONSTRATE THAT PROPOSALS MEET LOCAL AUTHORITY AND WELSH GOVERNMENT DESIGN QUALITY OBJECTIVES AND PLANNING POLICY.¹

IT IS CONCERNING THEREFORE THAT THE DAS MAKES ONLY FLEETING REFERENCE TO “WELSH GUIDANCE”² IN THE CONTEXT OF PLANNING POLICY, AND, RELIES HEAVILY ON ENGLAND’S NATIONAL PLANNING POLICY FRAMEWORK (NPPF)³. TO JUSTIFY THE PRINCIPLE OF DEVELOPMENT, SUSTAINABILITY, TRANSPORT IMPACTS, FLOOD RISK AND RESIDENTIAL AMENITY.⁴

As you’ll be aware the (NPPF) applies only to England and has no status in Wales. Planning applications in Wales must be assessed against Planning Policy Wales (Edition 12), Future Wales: the National Plan 2040, and relevant Technical Advice Notes, which together form the national planning policy framework for Wales.

As a result, the Design and Access Statement does not demonstrate how the proposal responds to the correct national planning policy context, including Welsh placemaking principles, national sustainable placemaking outcomes, and well-being objectives. The conclusions reached in the DAS should therefore be afforded limited weight.

A FURTHER SIGNIFICANT OVERSIGHT OF THE DAS IS ITS FAILURE TO RECOGNISE AND RESPOND TO THE WELLBEING OF FUTURE GENERATIONS ACT (WALES) 2015, AND ITS WELLBEING GOALS, WHICH UNDERPIN MANY OF WALES’ CURRENT PLANNING POLICIES AND PRINCIPLES. ITS SECTION ON COMMUNITY SAFETY AND ACCESSIBILITY IS UNDERMINED BY THE REFERENCE TO COMPLIANCE WITH THE DDA⁵; THE DISABILITY DISCRIMINATION ACT WAS REPLACED IN 2010 BY THE EQUALITY ACT.

SPECIFIC CONCERNS

1. ONE SIDED ASSESSMENT OF PLACEMAKING AND WELLBEING

While the proposal emphasises the health and wellbeing benefits to users of the facility, insufficient consideration has been given to the wellbeing of existing residents living adjacent to the site.

Chapter 2 of Planning Policy Wales – People and Places – is clear that placemaking is about the effects of development on people and communities, not just the users and beneficiaries of new developments. It states that placemaking should “support the wellbeing of people and communities across Wales” by maximising “the social, economic, environmental and

¹ [design-and-access-statements.pdf](#)

² DAS, p.4

³ Ibid. p.25

⁴ Ibid. (see Sections 3.5, 17, 19.1, 19.4, 19.6–19.9)

⁵ Ibid. p.27

cultural benefits, while considering potential impacts when assessing proposals”, in line with the Wellbeing of Future Generations Act.⁶

This matters because it expressly requires decision makers to consider potential impact and not only benefits. When applied to the application in question this must mean how the development affects existing communities as well as users of the development itself.

PPW goes on to state⁷ that balanced assessment of social, economic, environmental and cultural effects must be carried out. By definition a balanced assessment necessarily entails identifying benefits but also negative impacts. If the impacts on nearby residents are not assessed, then the PPW’s requirement for balance is not met. Indeed PPW’s list of factors to be considered include:

- who are the interested and affected people and communities
- how does the proposal change a person’s way of life
- who will benefit and suffer any impacts from the proposal
- what are the short and long-term consequences of the proposal on a community

The application does not adequately address issues like these in relation to the adjacent community of Traston, whose wellbeing is not being considered in the context of the proposed development.

2. RESIDENTIAL AMENITY AND NOISE IMPACT

Policy GP2 of the Newport LDP requires development to:

- Protect the amenity of existing occupiers
- Avoid unacceptable noise and disturbance
- Respond appropriately to its surrounding context⁸

The DAS concludes that the proposal will not result in unacceptable noise impacts. However there is an absence of quantitative evidence:

- No Noise Impact Assessment has been submitted
- No baseline noise environment has been established
- No assessment has been made of training sessions, match play, spectators, whistles, or raised voices
- No modelling of evening use up to 22:00 on weekdays has been provided

This lack of detail is in stark contrast to the level of detail provided in respect of planning application 11/0975 relating to the original development of the Newport International Sports Village including the football pitches adjacent to the residential development of Traston. In this instance a noise impact assessment was undertaken in to investigate the potential noise levels at the proposed artificial football pitch located at the Newport International Sports Village to assess the potential impact on the nearby residential area. This is the pitch located closest to the velodrome and not the grass pitch that abuts the

⁶ [planning-policy-wales-edition-12.pdf](#) para 2.8.

⁷ Ibid. para 2.27

⁸ Newport LDP, GP2, para 3.11

residential housing, and yet it was still considered important to carry out an assessment of this kind. Why, therefore, when the development under consideration is closer to the housing, is this type of investigation now considered not relevant?

The DAS goes on to state that “The scale, layout, and appearance of the proposal are appropriate to its setting and will not result in adverse visual or amenity impacts”, it provides no evidence to support this, and is positioning the context of this statement purely from the perspective of the NISV and not from that of the immediately adjacent residential properties.⁹

The proposed development represents a substantial intensification of use compared to the existing grass pitch. In the absence of any assessments or evidence, the application does not demonstrate compliance with Policy GP2, nor with Planning Policy Wales’ requirement to protect residential amenity and community well-being.

3. FLOODLIGHTS

WITH REGARDS TO THE PROPOSED INCLUSION OF 8NR FLOODLIGHTS, THE DAS SEEKS TO ESTABLISH TECHNICAL COMPLIANCE, BUT DOES NOT ADDRESS RESIDENTIAL EXPERIENCE; compliance with guidance should not automatically equal acceptability, especially when homes are nearby.

While the DAS states that the proposed floodlighting would comply with ILP Guidance for an E3 environment, no lighting contour plots, façade illuminance levels, or assessments from residential viewpoints are provided. The experience of neighbouring occupiers, particularly in relation to glare, light trespass into habitable rooms, and the perception of large-scale lighting columns, has not been properly assessed.

Given the proximity of residential properties and the proposed use of eight 15-metre floodlighting columns operating into the evening, the absence of a detailed residential lighting impact assessment is a significant omission.

Again, this shows that the application does not align with PPW and Policy GP2 of the Newport LDP which requires development to protect the amenity of existing occupiers.

4. TRAFFIC, PARKING AND EVENING DISTURBANCE

The proposal represents a significant intensification of use compared to the existing grass pitch, including organised evening sessions, competitive fixtures and spectator attendance. Despite this, no Transport Statement or assessment of peak-time traffic, parking overspill, or evening disturbance has been provided.

The assumption that traffic patterns will remain comparable to the existing situation is unsupported by evidence and does not take account of increased frequency, predictability and intensity of use associated with an all-weather, floodlit facility.

⁹ DAS p6, 4.2.6.

The area already experiences pinch points in terms of traffic congestion and the development is likely to only make this situation worse. There is no information on the total number of parking spaces that will be available across the NISV on completion of the development. Application 11/0975 allowed for 44 parking spaces; this development proposes 33, making 77 in total. Even with a limited number of unaccounted spaces being available at NISV it is difficult to see how this is sufficient for 250 spectators, players and officials, notwithstanding the fact that activity at the velodrome, pool and tennis centre will also be ongoing and cause further demand for parking spaces. It is a fair assumption – and one that the DAS fails to address – that demand for parking will result in cars using neighbouring, residential streets for parking.

There is also an absence of measures to encourage active travel, for example provision of cycle stands.

The assumption within the DAS that traffic patterns will remain comparable to the existing grass pitch is unsupported by evidence. This fails to demonstrate compliance with Policy GP4 of Newport's LDP - Highways and Accessibility – which requires development to not result in traffic exceeding the capacity of the highway network and to make adequate provision for car parking and cycle storage.¹⁰

5. Accessibility and Inclusion

It is disappointing that the DAS's reference to accessibility are limited, and that it references compliance with the DDA (Disability Discrimination Act), which was replaced by the Equality Act in 2010. 'Access' considerations are limited to the provision of 3nr accessible parking spaces.¹¹

Planning Policy Wales places inclusive design and well-being at the heart of placemaking, requiring development to be usable and beneficial to all members of the community, including disabled people and those with protected characteristics:

Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and difference, offer choice where a single design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone¹²

Design and Access Statements in Wales are expected to explain how inclusive access has been addressed, not simply describe physical arrangements. While the Design and Access Statement refers generally to accessibility and inclusion, it does not meaningfully address the requirements of inclusive design as set out in Planning Policy Wales, nor does it demonstrate consideration of duties arising under the Equality Act 2010.

The Statement does not:

- Identify potential equality impacts arising from increased evening activity, noise, lighting or crowd behaviour

¹⁰ Newport LDP, GP4, p.43

¹¹ DAS, p27, section 18.2

¹² PPW, p26, section 3.5.

- Consider the effect of these changes on disabled or elderly residents living adjacent to the site
- Explain how disabled spectators and visitors would safely and independently access, use and leave the facility, particularly during evening use
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Policy GP2 of the Newport City Council LDP requires development to protect the amenity of existing occupants, and Policy GP6 – Quality of Design – requires development to “create a safe, accessible ... environment”¹³. Without an adequate assessment of accessibility and equality impacts, it has not been demonstrated that this requirement would be met.

The absence of any clear equality or inclusive access appraisal represents a significant omission, particularly given the scale of intensification proposed and the introduction of floodlit evening use and spectator facilities. As you know, the Local Planning Authority is required to have due regard to equality implications at the decision-making stage, and at present the application does not provide sufficient information to enable this to occur.

6. Evidence of Need

Newport LDP’s Policy CF1 supports the need for the provision of community sports facilities where a need identified.¹⁴ Nowhere in the application is evidence of need provided. The DAS leans into an assumption that presumed community benefit outweighs impact on residential communities and their wellbeing; this seems difficult to substantiate in the light of the prevailing priorities of PPW.

In conclusion:

- The Design and Access Statement does not demonstrate how the proposal satisfies Planning Policy Wales requirements on placemaking, wellbeing, inclusive design and amenity protection
- Assertions are made without supporting assessments and evidence
- The proposal does not sufficiently demonstrate that it will protect residential amenity

Taken together, these issues indicate that the application is not supported by sufficient evidence to allow a robust assessment of impacts on nearby residential amenity. The reliance on the incorrect national policy framework, combined with the absence of key technical assessments, means that the proposal is not adequately justified in its current form.

Should the local planning authority be minded to support the principle of development, we request that the application be refused or deferred pending the submission of appropriate assessments, or that stringent conditions be imposed relating to hours of use, lighting, noise mitigation and spectator activity in order to safeguard residential amenity

¹³ LDP, p48, GP6

¹⁴ Ibid. p101