PLANNING, DESIGN, ACCESS, GREEN INFRASTRUCTURE AND DRAINAGE STATEMENT REDEVELOPMENT OF FORMER PRINCIPALITY HOUSE, WESTERN VALLEY ROAD, ROGERSTONE, NEWPORT NP10 9DS

1. Introduction

This statement is prepared on behalf of GHR Developments in support of the demolition and residential redevelopment of former Principality House, Western Valley Road, Rogerstone. The proposals comprise 17 one-bedroom affordable apartments in two buildings, together with access, car and cycle parking, private balconies, shared amenity space, landscaping, refuse storage, indicative rooftop solar photovoltaic panels and associated works.

The statement brings together the planning case, design and access assessment, proportionate Green Infrastructure Statement and high-level drainage principles. It should be read alongside the current C2J Architects drawings and visualisations, Apex Transport Planning & Engineering Transport Statement, Hunter Acoustics Environmental Noise and Vibration Assessment and Soltys Brewster Ecology Preliminary Roost Assessment contained in the application package.

The proposals have evolved through engagement with Newport City Council. Its written response of 13 August 2026, reference PRELET/P/26/0042, assessed a revised pre-application scheme of 21 apartments with seven parking spaces. The present 17-apartment scheme incorporates further changes to density, parking, amenity and landscaping.

The intended delivery model is 100% social rented housing, with the tenure secured through a Section 106 agreement. This is material both to the affordable housing benefits and to the assessment of car ownership and parking demand. The statement explains how that delivery model responds to the development plan and how the revised design brings the scheme into a more appropriate balance with its site constraints.

2. Site and Surroundings

The site occupies a narrow, previously developed parcel on the south-western side of Western Valley Road at Pye Corner. The railway corridor forms its rear boundary and established residential development surrounds the other sides. No. 9 Pye Corner adjoins the south-eastern end of the site. The immediate setting combines the highway and railway corridors, housing and a small number of local commercial and community uses.

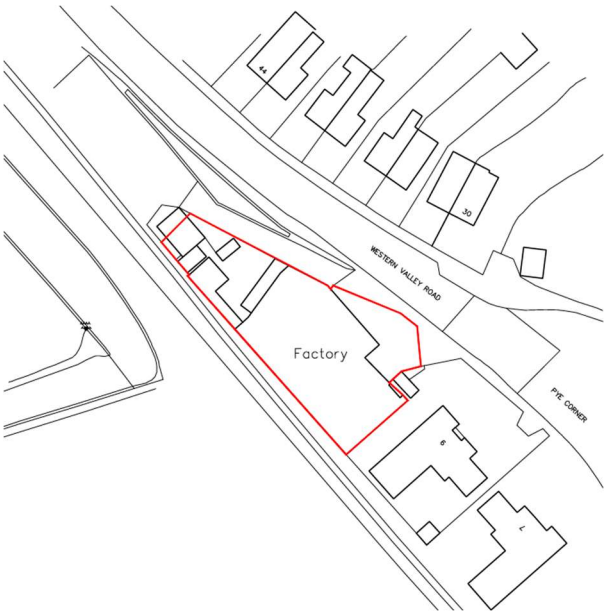

Figure 1: Site Location Plan

The existing premises were formerly used for manufacturing medical supplies / equipment. The building has a single-storey commercial character, with an irregular footprint, a central warehouse or factory space and extensions of differing roof forms. Ancillary containers and sheds occupy the remaining hard-surfaced curtilage.

Pye Corner station is approximately 200 metres from the site and bus stops are immediately nearby. Chapelwood Surgery and Well Pharmacy are approximately 350 metres away, a convenience store and post office at approximately 400 metres, and further facilities within the wider walking and cycling catchment.

The railway edge contains established trees and scrub outside or adjoining the developed parcel. The ecological assessment identifies this vegetation as a potential commuting and foraging corridor, notwithstanding the limited habitat value of the buildings and hardstanding within the site itself.

Figure 2: Google Maps 3D Image – Site illustratively shown in context

Figure 3 : Google Streetview image

3. Proposed Development

3.1 Current Proposals

The proposals replace the existing commercial premises with two contemporary apartment buildings. Block A occupies the northern part of the site and accommodates 11 apartments, with two at ground-floor level and three on each of the first, second and third floors. Block B occupies the southern part and provides two apartments on each of three floors, giving six apartments. All 17 homes are one-bedroom apartments.

The buildings are separated by an open central area accommodating parking, access, planting and servicing. The floor plans show the culvert / easement corridor through this space. The division into two blocks permits a break in the frontage and massing and avoids placing the main apartment footprints across the indicated corridor.

The scheme provides 11 parking spaces, including spaces beneath the northern building, and a central cycle store for 24 bicycles. Pedestrian routes connect the frontage, building entrances, cycle facilities, refuse area and shared garden. Block A includes a stair and lift core; Block B is served by a communal stair. Private balconies are incorporated into the apartment elevations and a separate shared amenity area, illustrated with seating, is provided at the northern end of the site.

The architectural palette comprises light-coloured brick, contrasting dark cladding, large glazed openings, glazed balcony screens and recessed elements. The staggered frontage and varied roof profile respond to the site's tapering shape. The elevations and visualisations show landscape planting around the buildings and parking areas. The roof plan identifies indicative solar PV.

Figure 4: Current proposed site plan, C2J Architects AL(90)10 Revision E. The northern shared garden, two blocks, central parking and cycle provision are shown.

3.2 Design Evolution and Response to Pre-Application Advice

The original pre-application proposals comprised 26 apartments, including a mix of one- and two-bedroom homes. The scheme was subsequently revised during the enquiry. The Council's 13 August 2026 response therefore relates to a different, later arrangement of 21 one-bedroom apartments in two blocks with seven parking spaces. The present proposals represent a further revision to 17 one-bedroom apartments and 11 spaces. The assessment below uses the 21-unit scheme as the direct baseline for the Council's feedback and distinguishes it from the initial concept.

The Council accepted the principle of residential development on this urban brownfield site and supported the contemporary architectural approach, light brick / dark cladding palette, articulation and stepped footprint. Its principal concern was whether the site could accommodate the proposed number of homes together with the parking, amenity and infrastructure they require. The revised proposals retain the supported design principles while reducing residential demand and giving greater priority to external provision.

Pre-application matter	Response in current proposals and supporting evidence
Residential capacity and overdevelopment	Apartment numbers reduced from 21 to 17: a reduction of four homes, approximately 20%. This reduces pressure on parking, refuse, cycles and shared space. The two-block arrangement and central open area are retained.
Insufficient car parking	Provision increases from seven to 11 spaces, while the parking ratio increases from 0.33 to 0.65 spaces per apartment. Apex C26080/TS01, Sections 6–7, provides the standards, tenure, Census and survey justification.
Sustainability and the gradient of High Cross Lane	The Transport Statement assesses actual routes, facilities and bus / rail provision. The case does not depend on all occupiers walking uphill to Greenfield Road. Nearby bus stops and the station provide alternatives, supported by 24 cycle spaces and a pre-occupation Travel Plan.
Limited usable communal amenity	A separate shared garden with seating has been incorporated at the northern end of the site, alongside private balconies.
Northern ground-floor living-room outlook	The northern apartment faces the area now shown as shared amenity and planting, improving its immediate setting.
Defensible space and a tight frontage	Planted margins are illustrated between building elements and the frontage / access lane. Their widths, enclosure and low boundary treatment should be fixed on the detailed landscape plan to maintain usable access and a clear private / public threshold.
Cycle and refuse provision / visual prominence	A dedicated 24-space cycle area is shown; the reduced unit number lowers servicing demand. Refuse remains at the rear edge ensuring subservience to the streetscene (see Figure 5). A detailed screened enclosure can be conditioned.
Effect on No. 9 Pye Corner	The southern block remains three storeys with a largely blank south-eastern side elevation and balconies directed towards the frontage.
A noise report relating to an earlier scheme	Hunter Acoustics 7993/ENS1 Revision 2, dated 11 September 2026, provides updated scheme-based modelling, critical façade specifications, ventilation advice and assessment of the northern shared amenity area.
Ecology, biodiversity and landscape / drainage integration	Soltys Brewster Ecology E26145001 / Doc 01, supplied as Revision A and issued for submission on 14 September 2026, incorporates the updated layout. Section 10 of this Statement sets out the stepwise GI response and commits to its lighting, species protection and enhancement recommendations.

Pre-application matter	Response in current proposals and supporting evidence
Employment land and contamination	Section 5 addresses every EM3 criterion and the planning balance. Section 11 identifies the required contamination assessment and the need to protect the culvert and demonstrate drainage feasibility.

Figure 5: C2J Architects visualisation View30A, showing the separation of the blocks, contemporary materials, balconies and landscape setting.

4. Planning Policy Context

4.1 Development Plan and National Policy

The statutory development plan comprises Future Wales: The National Plan 2040 and the adopted Newport Local Development Plan 2011–2026. The LDP was adopted on 27 January 2015. The Council is preparing a Replacement LDP for 2021–2036; the adopted plan remains the starting point for this assessment.

Future Wales supports growth in accessible urban locations, affordable homes and more sustainable travel. Policies 1 and 2 provide the spatial and urban placemaking context; Policy 7 supports increasing affordable housing supply; Policy 9 addresses resilient ecological networks and green infrastructure; and Policy 12 supports reduced car parking and low-car development in accessible urban locations. The scheme combines those objectives through brownfield housing, tenure-specific parking, cycle storage, planting and ecological enhancement.

Planning Policy Wales Edition 12 provides the national policy framework for placemaking, effective use of previously developed land, housing, the sustainable transport hierarchy, good design and environmental protection. The relevant topic assessments below apply that framework alongside the LDP. In particular, the proposals provide a proportionate GI assessment and use the stepwise approach to avoid, minimise, mitigate and, where necessary, compensate for effects, with enhancement additional to those measures.

Relevant Technical Advice Notes include TAN 2: Planning and Affordable Housing; TAN 5: Nature Conservation and Planning; TAN 11: Noise; TAN 12: Design; TAN 15: Development, Flooding and Coastal Erosion, in its current form; and TAN 18: Transport. The statutory national SuDS standards provide the separate drainage approval framework.

4.2 Newport Local Development Plan

The following policies are relevant to the proposal, including those specifically identified in the Council's response. The table signposts the substantive assessment and should be read with those sections; it is not a substitute for the evidence or an assertion that every criterion has already been satisfied.

Policy / topic	How it is addressed
SP1 Sustainability; SP2 Health	Urban brownfield redevelopment, affordable homes, access to facilities, private / shared outdoor space, active travel and acoustic protection. Sections 5–10.
SP4 Water Resources; SP5 Flood Risk	Foul drainage, surface water hierarchy, SAB approval, culvert protection and the need for current flood-map / consequence checks. Section 11.
SP9 Conservation of the Natural, Historic and Built Environment	Contemporary redevelopment responds to the road / railway setting; adjacent vegetation and ecological connectivity are protected. Sections 7 and 10.
SP10 House Building Requirement	17 additional windfall homes within the urban boundary contribute to housing delivery. Sections 5 and 6.
SP13 Planning Obligations	Social rented tenure and proportionate infrastructure / open-space measures to be secured through an appropriate agreement. Section 12.
SP17 Employment; EM3 Alternative Uses of Employment Land	The former employment use, all four EM3 criteria, Council employment supply evidence and any remaining policy departure are assessed. Section 5.2.
SP18 Urban Regeneration	Positive reuse of developed land, improved frontage and new affordable housing. Sections 5 and 13.
GP1 Climate Change	Compact development, sustainable travel, indicative PV, fabric / ventilation coordination, SuDS and planting. Sections 7–11.
GP2 General Amenity	Privacy, light, outlook, external space and relationships with No. 9 Pye Corner and properties across the road. Sections 7 and 9.
GP3 Service Infrastructure	Access, waste, foul / surface water and asset protection principles; detailed utility and drainage confirmation required. Sections 8 and 11.
GP4 Highways and Accessibility; T4 Parking; T5 Walking and Cycling	11 car spaces, 24 cycle spaces, access / swept paths, parking demand and surveys, Travel Plan and public transport connectivity. Section 8 and Apex Transport Statement.
GP5 Natural Environment	Ecological baseline, stepwise GI response, boundary vegetation, landscape and species enhancement, lighting and management. Section 10.
GP6 Quality of Design	Articulated two-block form, palette, scale, inclusive access, landscape and positive street frontage. Sections 3 and 7.
GP7 Environmental Protection and Public Health	Updated noise / vibration evidence, ventilation, air quality, contamination and construction management. Sections 9 and 11.
H2 Housing Standards; H3 Housing Mix and Density	One-bedroom affordable homes address demonstrated need; layouts, amenity and proportionate density are assessed in Sections 6–7.
H4 Affordable Housing	100% social rented delivery proposed, to be secured by agreement. Section 6.

Policy / topic	How it is addressed
H6 Subdivision of Curtilages, Infill and Backland Development	The capacity assessment considers homes and their supporting infrastructure together. Revised numbers / parking improve the balance; communal space and neighbour evidence remain relevant. Sections 3, 7 and 8.
H8 Self Contained Accommodation and Houses in Multiple Occupation	Each dwelling is a self-contained apartment with its own kitchen, bathroom and living accommodation. The proposal is not for an HMO or shared residential rooms. Sections 3 and 6.
W3 Provision for Waste Management Facilities in Development	Dedicated refuse storage, collection access and the requirement for detailed capacity, enclosure and screening. Sections 8.5 and 12.

Relevant adopted SPG includes Parking Standards, Sustainable Travel, Affordable Housing, Planning Obligations, New Dwellings, Wildlife and Development, Trees, Woodland, Hedgerows and Development Sites, Waste Storage and Collection, Air Quality and Outdoor Play Space Provision, where applicable. The parking and communal amenity provisions are considered directly rather than treated as issues resolved solely by the site's brownfield status.

5. Principle of Development

5.1 Brownfield Regeneration and Urban Housing

The Council's response expressly accepts the principle of residential development on previously developed land within the urban boundary, subject to the other planning considerations. The site is integrated into an established residential area, does not require expansion into the countryside and can contribute windfall housing towards Policy SP10 while advancing the regeneration objectives of SP18.

The proposals make productive use of a developed site and replace a utilitarian commercial frontage with well-defined residential buildings, entrances, balconies and planting. The rail and bus connections support a compact housing form. The resulting benefit is not confined to the new homes: the redevelopment can improve the street scene, introduce vegetation into a substantially hard-surfaced parcel and provide a use compatible with the surrounding residential setting.

The constrained shape does not preclude development; it requires a layout proportionate to what can be accommodated. The reduction to 17 homes, increased parking and dedicated garden are therefore integral to the planning case. Policies SP1, SP18, GP6 and H6 should be applied to the quality of the whole development, including usable external provision and neighbouring amenity, rather than residential density in isolation.

5.2 Alternative Use of Employment Land: Policy EM3

The site's former manufacturing use brings Policy EM3 into consideration notwithstanding its current vacancy and location outside a strategic employment allocation. The policy resists alternative uses unless its four criteria are met: unsuccessful employment marketing for at least 12 months; a sufficient range and choice of employment land / premises; no adverse effect on existing or allocated employment sites; and no adverse effect on amenity or the environment. Vacancy alone does not satisfy the first criterion.

EM3 criterion	Assessment
(i) At least 12 months of unsuccessful employment marketing	Marketing has been undertaken following the original pre-app engagement and is documented within the enclosed letter from NP Linells.

EM3 criterion	Assessment
(ii) Sufficient range and choice to meet plan requirements and local demand	The Council's October 2024 AMR records just over 116 hectares of undeveloped / uncommitted EM1 land and just under 11 years of employment land supply. This supports a healthy strategic supply context.
(iii) No adverse effect on existing or allocated employment sites	The proposal removes an isolated commercial parcel in a predominantly residential setting. It does not include adjoining employment land or require another employment site's access to be removed.
(iv) No adverse effect on amenity or the environment	Residential use is compatible with the surrounding housing. The updated acoustic report, ecology recommendations, landscape / drainage approach and construction controls provide a basis for avoiding environmental harm.

The Council's latest monitoring evidence provides important context for the scale of employment land affected. The 2023/24 AMR identifies just over 116 ha of undeveloped EM1 employment land, equivalent to almost 11 years' supply and described by the Council as a healthy level. At approximately 0.12 ha, the application site represents only around 0.1% of that available employment land supply.

The site is also constrained by the railway, neighbouring housing, limited frontage access and the culvert, and does not form part of a larger, flexible employment estate. Its loss would therefore have a negligible effect on the overall quantitative supply of employment land in Newport.

Whilst a full 12-month marketing has not been undertaken, the applicant's case is that these substantial and secured benefits justify a site-specific exception to EM3.

Figure 6: Marketing board at Site

6. Housing Need and Affordable Housing

The development is proposed as 100% social rented housing and responds directly to Newport's identified housing needs. The Council's Local Housing Market Assessment 2022–2037 identifies a net need for 1,104 additional social rented homes over its first five years, including 711 one-bedroom homes – around 64% of the total social rented requirement. This need is reinforced by the Council's 2025 Affordable Housing Prospectus, which identifies increasing the supply of one-bedroom general needs accommodation as a strategic priority. The Prospectus records 7,510 households on the housing register in November 2024, of which approximately 60% required one-bedroom accommodation, and identifies particularly high demand for one-bedroom homes within the Northwest submarket area encompassing Rogerstone and Graig.

A predominantly one-bedroom scheme is therefore appropriately targeted towards a clearly evidenced need. On this compact and accessible brownfield site, it provides accommodation for smaller households close to public transport and services. Policy H3 should be applied in that context: achieving an appropriate housing mix across Newport does not require every individual windfall site to replicate the full range of dwelling sizes, particularly where the proposed mix responds directly to an identified local need.

7. Design, Scale, Placemaking and Residential Amenity

7.1 Design Rationale and Character

The design responds to a parcel perceived between road and railway infrastructure, with a different grain from the surrounding domestic plots. The Council recognised that distinction and supported a higher-density contemporary approach. The current scheme retains that coherent rationale: it establishes a residential frontage without attempting to reproduce a conventional suburban layout that would disregard the geometry and constraints of the site.

The two buildings, staggered footprints, contrasting surfaces, deeper openings and projecting / recessed balcony elements give the elevations depth and rhythm. The gap between the blocks creates a visual break and allows light and views through the frontage. The southern block remains lower than the principal northern block, providing a change in scale towards No. 9 Pye Corner. Materials and architectural detailing can be secured through the detailed application and appropriate conditions under GP6.

The current external arrangement also gives landscape a defined role. Planted margins soften the building bases and parking, the northern garden provides a distinct destination and the retained railway vegetation supplies a wooded backdrop.

7.2 Scale, Levels and Efficient Use of Land

The proposed sections, AL(0)30, demonstrate the relationship with the railway, frontage lane, Western Valley Road and the dwellings opposite. The highway and existing houses sit above parts of the site, which reduces the perceived scale of the proposed three- and four-storey forms. At pre-application stage, the Council raised no concern regarding loss of light or overbearing effects on properties opposite, noting separation distances of approximately 29–30 metres and their generally higher ground levels.

The scale and density also accord with the direction of national policy. Future Wales Policy 2 seeks to increase population densities within urban areas and focus growth and regeneration around public transport nodes. Its supporting text promotes transit-oriented development, including compact and higher-density development around transport corridors and stations, and states that urban development should generally aim for at least 50 dwellings per hectare, with higher densities in more accessible locations. The efficient redevelopment of this brownfield site, adjoining the railway and with good access to public transport and local services, is consistent with those principles.

The apartment count has nevertheless been materially reduced from the pre-application scheme while infrastructure and external provision have increased. The resulting density therefore represents an appropriate balance between making efficient use of a highly accessible urban site, meeting the identified need for smaller affordable homes and securing good living conditions and an appropriate relationship with neighbouring development.

Figure 6: Proposed elevations, C2J Architects AL(0)20 Revision D, illustrating the material palette, stepped profile and two-block arrangement.

7.3 Internal Layout, Light and Outlook

The drawings show domestic layouts with windows to bedrooms and living spaces, storage and usable circulation rather than single-room bedsits. Both blocks use communal access. Newport's New Dwellings SPG identifies 46 square metres as the desired minimum GIA for a new one-bedroom common-access flat; the proposals meet this standard.

7.4 Private and Communal Amenity

Private balconies are shown serving the apartments and they exceed the New Dwellings SPG expectation of at least 1.5 metres by 1.5 metres for one-bedroom homes. These spaces provide direct

access to fresh air, sitting-out opportunities and an individual outdoor area, complementing the communal garden.

A shared amenity area with seating is now expressly identified at the northern end of the site. Its location separates the principal sitting-out space from the central refuse and vehicle areas. The landscape design should give it usable seating, an accessible route, adequate boundary enclosure and a balance of planting and clear space.

The SPG itself recognises that physical and financial constraints can prevent full on-site provision and identifies possible contributions towards local public open space. That is directly relevant to this constrained, developed parcel. A proportionate response can combine a usable on-site garden, private balconies and any necessary contribution to identified local open-space improvements. The benefits of affordable housing and efficient use of land add weight to that approach.

7.5 Neighbouring Residential Amenity

The most sensitive relationship is with No. 9 Pye Corner, where the Council identified side-facing ground- and first-floor openings. Block B has been designed specifically in response to this relationship, with no habitable-room windows facing the shared boundary and balconies directed towards the road frontage. The application site also lies to the north of No. 9, further limiting the potential for adverse daylight or overshadowing effects. The resulting relationship is therefore considered to maintain an appropriate level of privacy, outlook and residential amenity.

More generally, the replacement of the existing manufacturing use with residential development would introduce a use that is inherently more compatible with the predominantly residential surroundings. It would remove the potential for industrial servicing, vehicle movements and operational disturbance immediately adjoining neighbouring homes. Subject to the proposed design and normal management arrangements for lighting, refuse and communal areas, the development would not give rise to unacceptable amenity impacts and is considered fully consistent with the relevant development plan requirements for neighbouring amenity.

7.6 Inclusive Design, Community Safety and Sustainability

Pedestrian routes provide clear and direct connections from the site frontage to the building entrances, cycle storage, communal garden and refuse facilities. The access arrangements have been designed to provide practical and legible movement through the site, with appropriate consideration given to gradients, thresholds, route widths, surface treatments and crossing points. Block A is served by a lift, providing convenient vertical access to the upper floors, while the layout as a whole provides an appropriate level of accessibility having regard to the nature and scale of the development.

The parking layout includes 11 spaces positioned in close proximity to the residential entrances and is capable of accommodating the needs of residents with reduced mobility through appropriate allocation and management. Secure cycle storage is also provided in convenient locations, supporting active travel and reducing reliance on the private car in this accessible urban location.

The layout incorporates good principles of community safety and natural surveillance. Windows and balconies overlook the principal access routes and external areas, while clearly defined entrances, secure cycle storage, appropriate boundary treatments and sensitively designed lighting will provide a safe and welcoming residential environment. These measures can be supplemented through the detailed specification of the scheme having regard to Secured by Design principles.

The development also incorporates a range of measures which support sustainable design, including the efficient use of a brownfield site, compact development, sustainable travel opportunities, new landscaping, indicative photovoltaic panels and improved surface-water management. Building fabric, glazing, ventilation, shading and thermal performance will be coordinated through the detailed design to secure comfortable internal conditions alongside the required acoustic performance. Taken

together, these measures provide a positive response to Policy GP1 and the sustainable design objectives of TAN 12.

8. Access, Parking and Sustainable Transport

8.1 Sustainable Movement and Local Facilities

The site is highly accessible by sustainable modes. Pye Corner railway station lies approximately 200 metres from the site and bus stops at Pye Corner Junction are approximately 20 metres away, providing regular connections towards Newport, Rogerstone and Blackwood. The Transport Statement also identifies a range of everyday services within the surrounding area, including a GP surgery, pharmacy, convenience store, post office, primary school, community facilities and leisure opportunities.

This level of accessibility is an important consideration in assessing both the sustainability of the location and the appropriate level of car parking. Residents would have genuine alternatives to private car use for a range of everyday journeys. The proposed ground-floor accommodation, lift access within Block A and provision for mobility-related parking further support the accessibility of the scheme. A Travel Plan will reinforce these advantages by providing residents with clear and up-to-date information on available walking, cycling and public transport options.

The proposal therefore accords with the objective of locating development where reliance on the private car can be reduced and sustainable travel choices are readily available.

8.2 Vehicle and Pedestrian Access

The development would utilise the established access arrangement from Western Valley Road via the existing frontage lane, with two access points serving the proposed parking areas. The Transport Statement confirms that the arrangement is capable of accommodating the development and includes swept-path analysis demonstrating satisfactory manoeuvring within the site.

The proposal does not require the creation of a new vehicular access through neighbouring residential land and broadly reflects the established access pattern. The railway maintenance function of the frontage lane would be retained, with any necessary access-control and maintenance arrangements capable of being agreed with the relevant parties.

Pedestrian access would be provided directly from the existing frontage footway into clearly defined internal routes serving both apartment blocks and the communal areas. Detailed design of thresholds, gradients and crossing points will ensure safe and convenient pedestrian movement throughout the development.

The access arrangements are therefore considered appropriate for the scale and nature of the proposal and capable of operating safely without unacceptable effects on the local highway network.

8.3 Parking Standards and Tenure-Related Demand

The development provides 11 car parking spaces, equivalent to approximately 0.65 spaces per dwelling. This represents a substantial improvement over the seven spaces proposed for the earlier 21-home scheme considered at pre-application stage.

Apex identifies the adopted Zone 3 parking standard as a benchmark but also highlights the flexibility expressly provided within the Council's Parking SPG where site accessibility, Travel Planning and evidence of lower car ownership justify a reduced level of provision. That flexibility is particularly relevant in this case given the site's proximity to rail and bus services and the proposed 100% social rented tenure.

The Transport Statement provides specific car-ownership evidence to inform the assessment. Census data indicates approximately 0.7 cars per social rented household within Newport 016D LSOA and approximately 0.6 cars per social rented household across Newport as a whole. Applied to the 17

proposed homes, these figures indicate likely resident demand in the order of 10–12 vehicles. The provision of 11 on-site spaces therefore sits within the evidenced range of likely demand.

The analysis is further supported by observations undertaken at an occupied affordable apartment development on Newport Road, Risca, where materially lower levels of parking demand were recorded. While this is appropriately treated as supporting rather than determinative evidence, it reinforces the conclusion that conventional market-housing parking assumptions are unlikely to reflect demand generated by the proposed tenure and dwelling mix.

The parking assessment should therefore be considered in the round. The scheme provides substantially more parking than the earlier proposal; the site is exceptionally well served by public transport; the tenure is 100% social rented; Census evidence demonstrates lower car ownership within comparable households; and local parking surveys identify significant additional highway capacity if limited residual demand arises.

The social rented tenure will be secured through the Section 106 Agreement and is therefore a permanent and material component of the parking assessment. Appropriate parking management arrangements can ensure that spaces are allocated efficiently, including provision for residents with mobility needs.

Taken together, the evidence provides a robust site-specific justification for the level of parking proposed and for the flexibility permitted by Policies GP4 and T4 and the adopted Parking SPG.

8.4 Parking Surveys and Residual Demand

The Transport Statement also provides detailed parking stress surveys undertaken between 12 and 14 May 2026 during evening and overnight periods. The survey area extends approximately 200 metres from the site and excludes restricted spaces, private accesses and sections of highway unsuitable for lawful parking.

Across the surveyed area, Apex identifies capacity for 76 vehicles. The highest observed occupancy was only 21 vehicles, equivalent to 28%, leaving 55 spaces available at the busiest surveyed period.

Importantly, the assessment does not rely upon the resident-permit or time-limited bays on Western Valley Road as available capacity for the development. The conclusion is instead based upon the substantial amount of lawful unrestricted parking identified within the wider survey area.

This represents a significant margin when compared with any plausible residual demand arising above the 11 spaces provided within the site. Even allowing for normal variation in parking conditions, the surveys demonstrate that limited overspill associated with residents or visitors could be accommodated without creating material parking stress, obstruction or highway safety concerns.

The applicant will also provide a Travel Plan and appropriate parking management arrangements prior to occupation. Together with the on-site parking provision, secure cycle storage and secured social rented tenure, these measures provide a proportionate and evidence-based response to the Council's earlier parking concerns.

The Transport Statement therefore demonstrates that the level of parking proposed would not result in unacceptable displacement, parking stress or highway safety effects.

8.5 Cycle Storage, Refuse and Emergency Access

The development provides 24 cycle spaces within a centrally located secure store. This substantially exceeds the nine spaces identified by Apex when applying the relevant Sustainable Travel SPG standard to the development.

The level and location of provision will make cycling a realistic option for residents and complements the site's strong public transport accessibility. The final specification will ensure that the store is secure, covered and readily accessible and that the capacity shown on the plans can be used effectively.

Refuse storage is provided along the rear of the site. The Transport Statement confirms that collections can take place from Western Valley Road without requiring refuse vehicles to enter the development, with the proposed collection point lying within an appropriate distance of the highway. The detailed specification of the store will accommodate the required waste streams and will be integrated with the landscape and boundary treatment.

Apex also confirms that a fire appliance can approach within 45 metres of the proposed buildings. The layout therefore provides an appropriate basis for emergency access, with detailed fire safety matters addressed separately through the Building Regulations process.

The proposed cycle, servicing and emergency access arrangements are consequently considered appropriate for a residential development of this scale.

8.6 Trip Generation and Highway Effects

The Transport Statement forecasts a maximum of only five two-way vehicle movements during the busiest peak hour. This represents a very modest level of traffic generation and would have no material effect on the operation or safety of the surrounding highway network.

The assessment also places the proposal in the context of the site's established industrial use, which is capable of generating servicing movements and commercial vehicle activity. The proposed residential use would therefore not introduce an intensity of highway activity that is unusual or unacceptable for the location.

Having regard to the modest forecast trip generation, established access arrangement, 11 on-site parking spaces, extensive cycle provision, proximity to rail and bus services and substantial surveyed parking capacity, the proposal can be accommodated without unacceptable transport or highway impacts.

The submitted evidence therefore demonstrates that the development is consistent with the relevant transport policies of the development plan and provides an appropriate and sustainable transport solution for the site.

9. Noise, Vibration, Air Quality and Public Health

9.1 Noise

The application is supported by an updated Environmental Noise and Vibration Assessment prepared by Hunter Acoustics (ref. 7993/ENS1 Revision 2, dated 11 September 2026). The assessment has been prepared specifically for the current scheme and includes façade modelling together with an assessment of the proposed northern communal amenity area.

The survey identifies road traffic as the dominant source of ambient noise during both daytime and night-time periods. The site falls within TAN 11 Noise Exposure Category B, within which residential development is acceptable subject to appropriate acoustic design.

Hunter Acoustics has assessed the building fabric required to achieve internal noise levels of 35 dB LAeq,16h during the day and 30 dB LAeq,8h at night, together with suitable control of individual train pass-by events. The report identifies those façades requiring enhanced acoustic glazing and confirms that the necessary internal standards can be achieved through an appropriate combination of glazing, building fabric and mechanical ventilation.

On the most exposed façades, whole-dwelling ventilation will not rely on open windows or standard trickle ventilators. Continuous mechanical supply and extract ventilation with heat recovery is proposed, while windows may remain openable for purge ventilation and occupant choice. Detailed specification of glazing, ventilation equipment, frames, seals and external wall and roof construction can be secured by condition.

The updated assessment therefore demonstrates that a satisfactory internal acoustic environment can be achieved without constraining the residential use of the site. The required mitigation is conventional and capable of being fully incorporated through detailed design, consistent with Policies GP2 and GP7 and the requirements of TAN 11.

9.2 Rail Vibration and External Amenity

The vibration survey demonstrates that railway vibration is well below the relevant residential assessment criteria. Hunter Acoustics records maximum vertical vibration dose values of approximately 0.015 m/s1.75 during the day and 0.013 m/s1.75 at night, compared with assessment limits of 0.4 and 0.26 m/s1.75 respectively.

There is therefore a substantial margin between the measured vibration levels and the thresholds at which adverse residential effects would arise. Railway vibration does not represent a material constraint to the proposed development.

The northern communal amenity area has also been specifically modelled. Predicted daytime noise levels are approximately 55–56 dB LAeq,16h. Hunter Acoustics concludes that these conditions are reasonable for communal external amenity space associated with an apartment development in this urban location.

Hunter Acoustics concludes that there are no noise or vibration constraints preventing residential development of the site, subject to implementation of the identified mitigation. The application therefore provides a robust scheme-specific basis for concluding that acceptable residential amenity can be achieved in accordance with Policies GP2 and GP7 and TAN 11.

9.3 Air Quality and Construction Effects

The development would generate only a modest level of additional vehicle activity and is located in a highly accessible location with strong opportunities for travel by rail, bus, walking and cycling. The proposal is therefore not expected to result in a material deterioration in local air quality.

The change from an established manufacturing use to residential development would also remove the potential for industrial operational activity immediately adjoining existing homes. The proposed use is consequently compatible with the predominantly residential character of the surrounding area.

Standard construction controls can adequately address temporary dust, noise, vibration, deliveries, lighting and waste management during demolition and construction. These matters are capable of being secured through a Construction Environmental Management Plan and other normal planning conditions. They do not represent constraints to the principle or acceptability of the development. The proposal therefore provides an appropriate response to Policy GP7 and the wider objective of securing a high-quality residential environment.

10. Green Infrastructure, Ecology and Trees

10.1 Green Infrastructure Statement and Ecological Baseline

This section forms the Green Infrastructure Statement for the development and is informed by the Preliminary Roost Assessment prepared by Soltys Brewster Ecology (ref. E26145001 / Doc 01, Revision A, dated 14 September 2026).

The ecological assessment included a desk study, inspection of the building and its curtilage and consideration of the adjoining railway vegetation. The building inspection was undertaken on 17 June 2026.

The application site is predominantly occupied by buildings and hardstanding and is assessed as being of negligible ecological value, with only limited areas of common ruderal vegetation. No evidence of roosting bats was recorded and the main building, containers and shed were assessed as having negligible potential to support bat roosts. No invasive plant species listed under Schedule 9 were identified.

The adjoining railway embankments provide the more significant ecological feature in the immediate locality. Soltys Brewster identifies these areas as providing moderate-quality habitat for bat foraging and commuting and potential nesting habitat for birds. The development has therefore been designed to retain appropriate separation from this corridor and to ensure that landscaping, lighting and construction activity respond positively to its ecological function.

The ecological evidence demonstrates that redevelopment of the site can proceed without unacceptable effects on protected species or habitats. The development also provides an opportunity to secure a clear net improvement over the existing heavily developed baseline through new planting, landscape enhancement and biodiversity measures integrated into the site layout.

10.2 Stepwise Approach and Ecological Enhancement

The scheme applies the stepwise approach by concentrating development on the existing buildings and hardstanding, retaining the adjoining railway vegetation as an important ecological corridor and avoiding unnecessary encroachment into boundary habitat. Construction impacts will be minimised through protection of retained vegetation, sensitive lighting and appropriate working methods.

The development will deliver a clear ecological improvement over the predominantly hard-surfaced baseline through new trees, native and wildlife-beneficial planting, flowering species and integrated bird and bat features. The proposal therefore follows the avoid–minimise–mitigate–compensate–enhance hierarchy and is capable of delivering a net benefit for biodiversity.

10.3 Protected Species and Enhancement Measures

The recommendations of the Soltys Brewster assessment will be implemented. Demolition and vegetation clearance will follow appropriate ecological precautions, including measures for bats and nesting birds.

The scheme will also provide the recommended six integrated ecological features comprising two house sparrow boxes, two swift boxes and two bat boxes. Their detailed locations will be incorporated into the final ecological enhancement plan.

External lighting will be designed to protect the railway habitat corridor, with light spill along the sensitive southern and western boundaries limited in accordance with the ecologist's recommendations.

10.4 Landscape, Resilience and Management

The landscape strategy will introduce new trees, shrubs and flowering planting around the buildings and communal garden, strengthening the site's biodiversity, amenity and climate-resilience functions. Planting will prioritise native and wildlife-beneficial species and will connect visually and ecologically with the retained railway corridor.

The landscaping will also soften the development, provide shade and cooling, intercept rainfall and improve the quality of the communal external space. Opportunities for vegetated SuDS will be incorporated where compatible with the detailed drainage strategy.

Long-term landscape and ecological management will secure establishment of planting, replacement of failures, retention of bird and bat features and continued protection of sensitive habitat areas. The proposals therefore provide a positive response to Policy GP5, Future Wales Policy 9 and the net-benefit-for-biodiversity requirements of Planning Policy Wales.

11. Drainage, Flood Risk and Ground Conditions

11.1 Drainage and SuDS

The site is currently almost entirely developed and hard surfaced. Redevelopment therefore provides a clear opportunity to improve the management of surface water through the introduction of SuDS, landscaping and areas of increased permeability.

The detailed drainage strategy will be progressed through the statutory SAB process and coordinated with the proposed buildings, parking, communal garden and landscape scheme. In accordance with the national SuDS standards, the design will consider rainwater reuse, infiltration where ground conditions permit, attenuation, water-quality treatment and an appropriate discharge hierarchy.

Potential measures include permeable surfacing, rain gardens and other planted features alongside appropriately designed attenuation. The final solution will respond to site levels, ground conditions, the railway and the existing culvert while also contributing positively to amenity and biodiversity.

The development therefore provides the opportunity for a material improvement over the existing predominantly impermeable condition of the site.

11.2 SAB and Landscape Integration

Separate SAB approval will be obtained before relevant construction works commence. The detailed design will demonstrate appropriate hydraulic performance, water-quality treatment, exceedance management and long-term maintenance.

SuDS will be integrated with the landscape strategy wherever practicable so that drainage infrastructure also contributes to the amenity and biodiversity objectives of the development. This coordinated approach will ensure that the drainage solution complements, rather than competes with, the proposed communal space and green infrastructure.

Figure 7: Landscape to Site Frontage

Figure 8: Landscape to soften buildings

11.3 Culvert, Foul Drainage and Infrastructure

The existing culvert has been recognised as an important site constraint and has informed the layout. The separation between the principal building blocks maintains a clear corridor through the site and provides an appropriate basis for continued inspection and maintenance access.

Foul drainage will connect to the appropriate public sewer subject to the usual agreement with Dŵr Cymru Welsh Water. Surface and foul drainage will be managed separately in accordance with the relevant statutory requirements.

The proposed layout therefore provides a suitable framework within which both the culvert and drainage infrastructure can be satisfactorily accommodated.

11.5 Contamination and Ground Conditions

Given the site's former manufacturing use, a Phase 1 land contamination assessment can be conditioned. This represents an appropriate and standard response to the historic use of previously developed land.

The assessment will identify any potential sources, pathways and receptors and establish whether further intrusive investigation or remediation is required. Where necessary, detailed remediation and verification can be secured through planning conditions.

Ground conditions will also be coordinated with foundation design, drainage, the railway and existing buried infrastructure. There is no evidence to suggest that these matters represent an overriding constraint to redevelopment, and they are capable of being addressed through established investigation, remediation and engineering techniques.

The proposed approach therefore provides an appropriate response to Policies SP4, SP5, GP1, GP3 and GP7.

12. Planning Balance and Conclusion

The proposal represents a clear opportunity to regenerate a constrained and underutilised brownfield site within Newport's urban area and deliver 17 much-needed one-bedroom social rented homes. The scheme responds directly to the Council's identified affordable housing need, makes efficient use of a highly accessible site close to rail and bus services and would replace the existing industrial premises with a high-quality residential development incorporating new landscaping, communal amenity space and ecological enhancement.

The development has evolved materially in response to the Council's pre-application advice. The number of homes has been reduced from 26 to 17, while parking has increased from seven to 11 spaces and a dedicated communal garden has been introduced. The revised scale and layout provide an improved relationship with neighbouring properties and a more balanced response to access, amenity and infrastructure requirements.

The technical evidence also demonstrates that the site is suitable for residential redevelopment. The Apex Transport Statement identifies a sustainable and accessible location, provides tenure-specific evidence supporting the proposed parking provision and demonstrates substantial spare parking capacity within the surrounding area. The updated Hunter Acoustics assessment confirms that acceptable internal and external acoustic conditions can be achieved, while the ecological assessment establishes a low-value developed baseline and identifies measures that will secure biodiversity enhancement.

The loss of the existing employment site must be weighed against its constrained nature and the wider employment land position. The site represents only a very small (0.1%) proportion of Newport's available employment land supply and does not form part of a larger strategic employment estate. In contrast, the development would secure permanent delivery of 17 social rented homes addressing a particularly acute need for one-bedroom accommodation.

The proposals therefore deliver significant and tangible planning benefits: affordable housing, brownfield regeneration, efficient use of land in a highly accessible location, improved townscape, reduced potential for industrial disturbance adjoining existing homes, sustainable travel opportunities and ecological enhancement.

Having regard to the development plan as a whole, Future Wales, Planning Policy Wales and the supporting technical evidence, the proposal represents an appropriate and sustainable form of development. Any remaining detailed matters are capable of being satisfactorily addressed through the final application documentation, planning conditions, the Section 106 Agreement and the separate SAB process.

The planning balance therefore weighs clearly in favour of the development, and there are no identified technical or policy matters that would justify withholding planning permission.