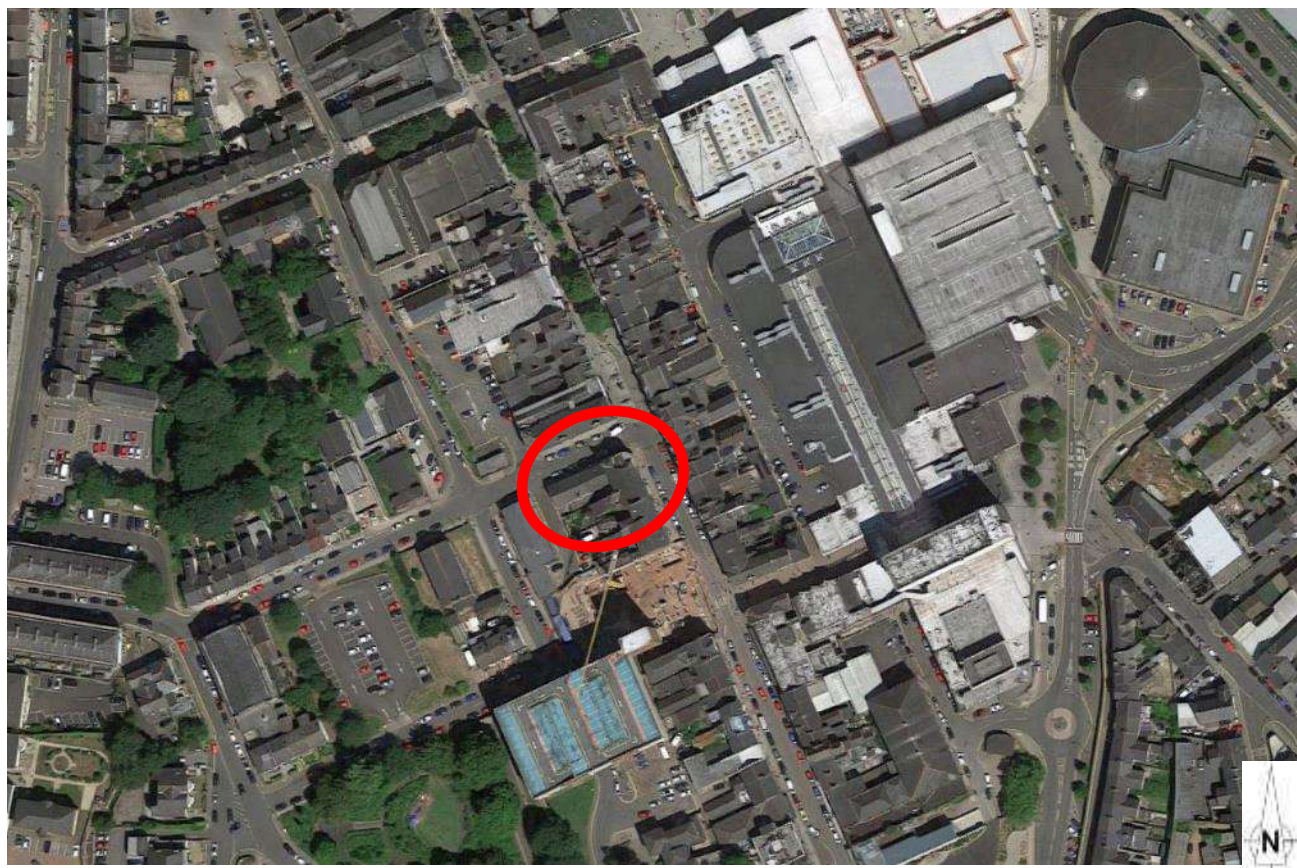


Proposed mixed use development at 133 - 135 Commercial Street, Newport

133-135 Commercial Street
Newport
NP20 1LY

December 2019
M2M/3076/2019

Contents



Aerial Location

Site Location Aerial Views (Copyright - Google Maps)

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THIS DESIGN AND ACCESS STATEMENT IS TO BE READ IN CONJUNCTION WITH
SUBMITTED PLANNING DRAWINGS AND SUPPORT DOCUMENTATION

1.0 Introduction

This Design and Access Statement has been prepared by Morgan2Morgan Architects on behalf of Property Index Ltd to accompany a detailed planning application for the redevelopment.

This document should be read alongside the set of drawings submitted with this planning application.

This report follows guidance set out in the Technical Advice Note (TAN) 12:Design (2016) and will address the planning, access and sustainability requirements set out in the Newport Local Development Plan (2011 - 2026).

After meeting with Newport City Council Planning Department to discuss pre-application and sketch scheme proposals, the planning issues and design principles have been addressed and a final scheme has been produced.

The application is for a sustainable mixed use development to take place in the Kingsway area of Newport and will comply with both the relevant local development planning policies, and national planning guidance.

The development will provide 22 residential accommodation with 3 no existing retail units to the ground floor. The proposed development will bring about local regeneration benefits and will provide a high quality mixed use scheme to the Kingsway area of Newport.

The design proposal seeks to remove part of the existing buildings that currently sit within the site boundary. These buildings consist of part of an existing two storey annex to the rear.

Location:

133 – 135, Commercial Street, Newport, NP20 1LY.

The Site:

Located at the junction of Commercial Street and Hill Street in the Kingsway Area of the city of Newport, the 0.34 acre site holds a prominent corner position along the busy Commercial Street. The proposed site is predominantly bordered with a variety of commercial and existing retail units which form a shopping parade along Commercial St situated in Newport city centre.

The proposed site contains three separate properties within the site boundary.

The three properties in question have separate uses. -

- 133 , Commercial Street, Newport - Tattoo Shop
- 134 , Commercial Street, Newport - Lovely Nails - Beauty Salon
- 135 , Commercial Street, Newport - Aesthetics clinic

2.0 Site Analysis

2.1 Location & Context

Located in Newport city Centre and is within close walking distance of various local amenities.

This development phase covers 0.34 acres and is noted as a prominent corner site.

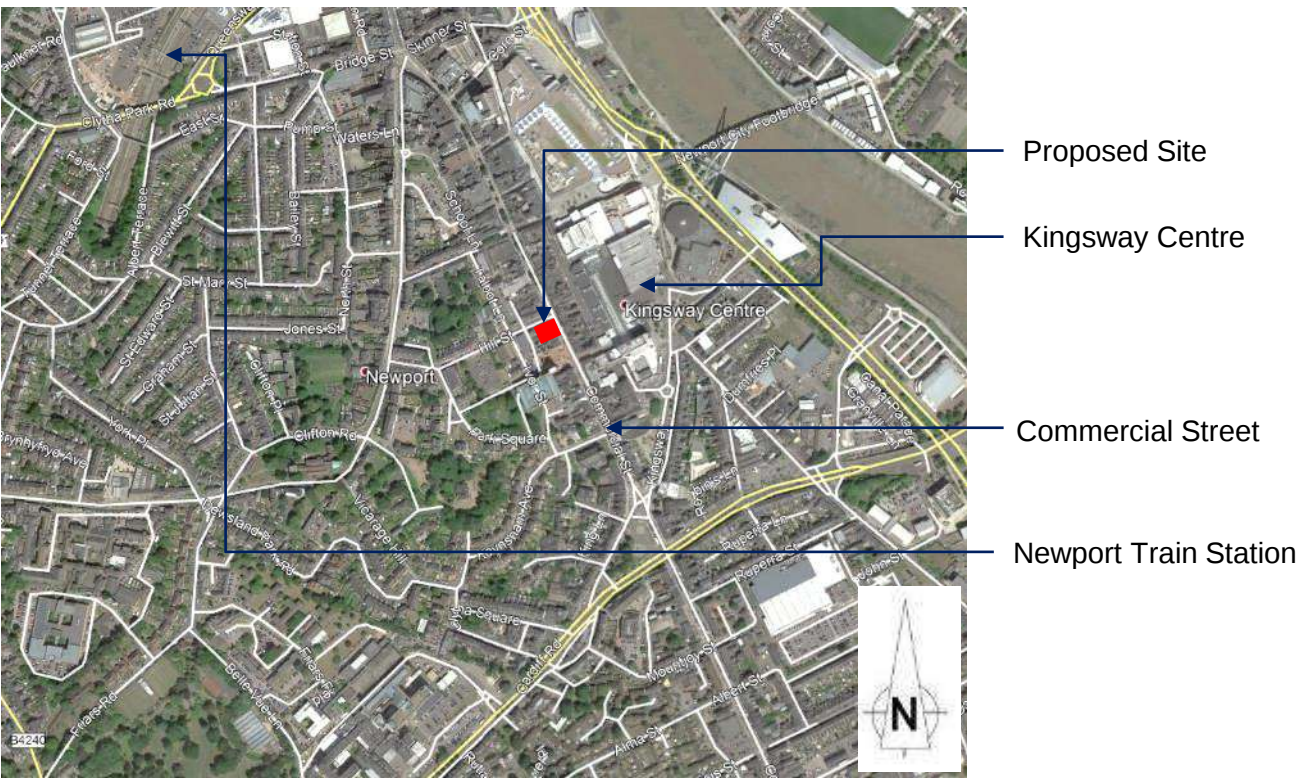
The site is closely situated within a busy local shopping area of Newport. The front of the site faces Commercial Street and sides onto Hill Street.

The boundary of the site to the rear is bordered directly onto an access lane that is used to provide access to the rear of numbers 130-135 Commercial Street as well as the Salvation Army Citadel on Hill Street.

Public transport within the area is very accessible with the closest train station being 0.5 miles at Queensway and the nearest bus station being 0.4 Miles at friars Walk.

In conclusion the surrounding area is characterised by a mix of commercial units and ground floor levels and residential properties from first floor and above. All of which vary in architectural styles, mass and scale.

The characteristics mentioned suggest that immediate existing local surroundings are largely made up of typical 19th Century city centre features.



Site Location – Not to scale

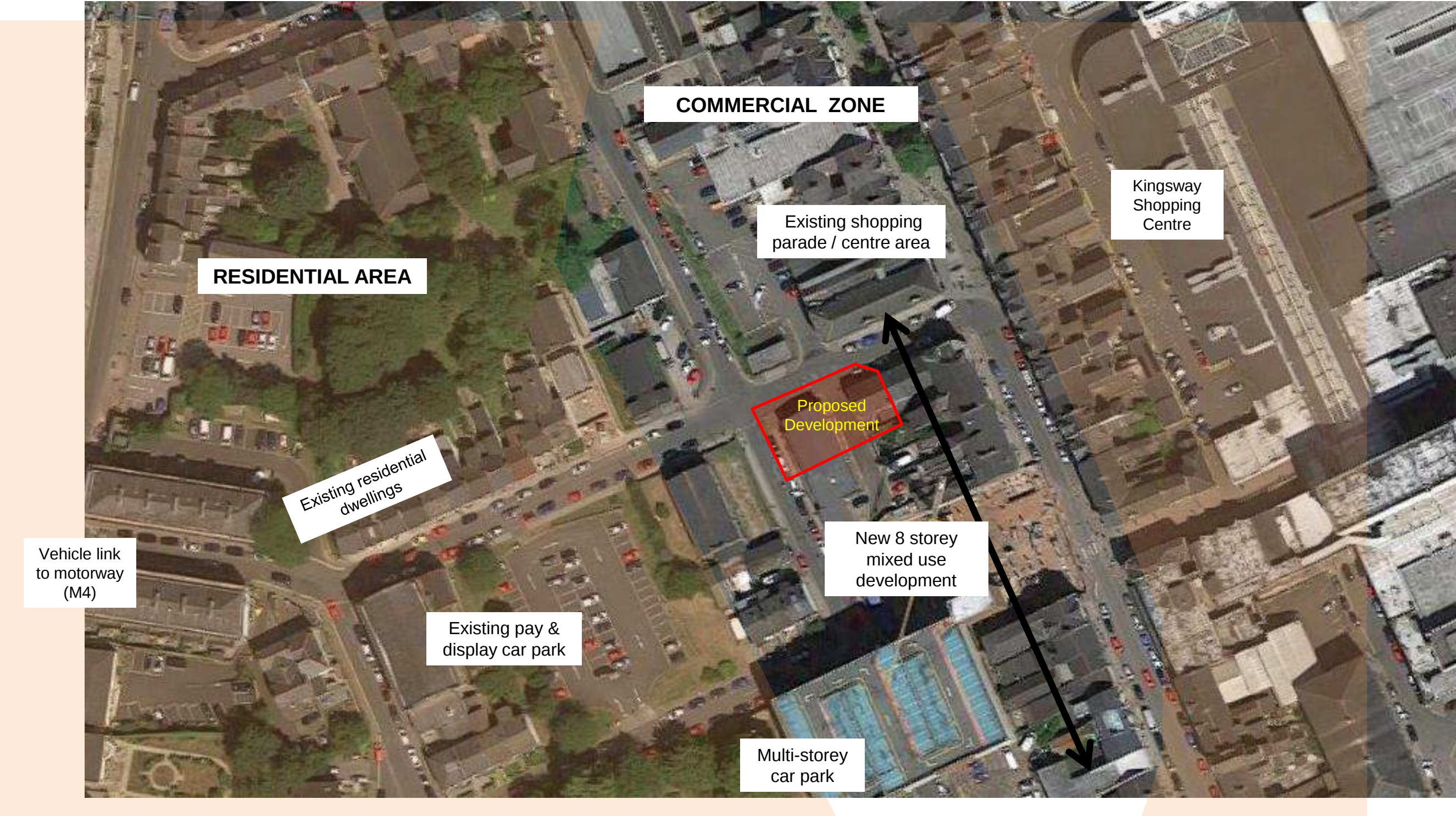


OS Location Plan – Not to scale

Site Location (Copyright - Google Maps)

2.0 Site Analysis

2.1 Location & Context



Site Location Aerial Views (Copyright - Google Maps)

133 - 135 Commercial Street, Newport.

2.0 Site Analysis

2.1 Location & Context



View from Hill Street showing existing North West facing building facades



View from corner of Commercial showing existing South facing building facades

2.0 Site Analysis

2.1 Location & Context



View of existing properties looking North West along Commercial Street at No's 133 - 135



View of Front Elevation of existing properties - No's 133 - 135 Commercial Street



View of existing 135 Commercial Street looking up Hill Street



View of existing 135 Commercial Street looking up Hill Street



Eastern Front Elevation of 134 -135 Commercial Street



Corner Elevation of 134 -135 Commercial Street



Northern Elevation of 134 -135 Commercial Street/ Hill Street

2.0 Site Analysis

2.1 Location & Context



View looking West at the existing rear annex on Hill Street



View looking South at the existing rear annex on Hill Street



View looking South East at the existing rear annex on Hill Street



View looking East at the existing rear annex on Hill Street



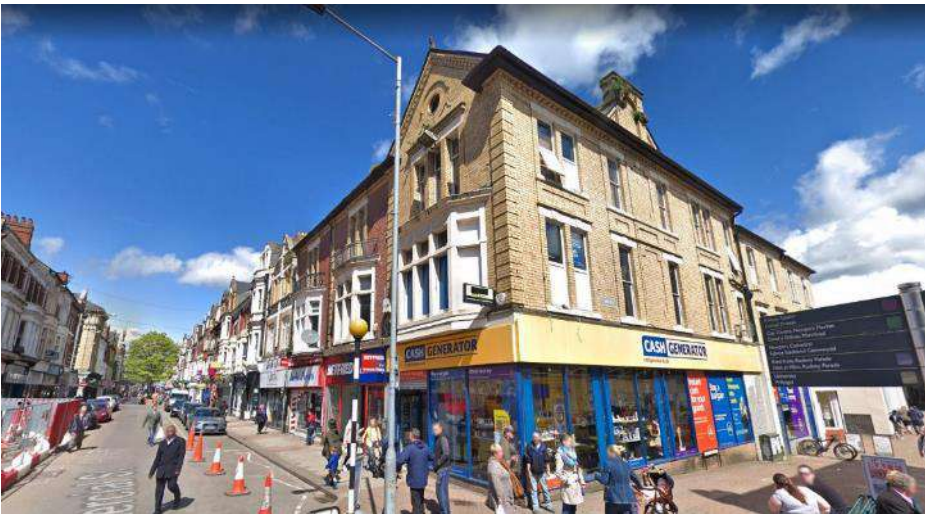
View looking East at the multiple existing rear annexes to the rear of the site



View looking East at the multiple existing rear annexes to the rear of the site

2.0 Site Analysis

2.1 Location & Context



View of existing nearby commercial units situated on Commercial Street



View of existing St David's House, positioned on the opposite corner of Commercial Street



View of close-by existing charity church and community centre building situated to the rear of the proposed site on Hill Street



View of closest existing residential dwellings on Hill Street



View of existing local shopping parade facing opposite the proposed site, along Commercial Street



View of adjoining commercial units located on Commercial Street

2.0 Site Analysis

2.1 Location & Context



View looking North on Commercial Street



View looking South on Commercial Street



View looking East down Hill Street to the rear of the proposed site



View of the existing residential dwellings on Victoria Place



View heading East along Stow Hill towards Hill Street



View of Victoria Place to the West of the Proposed Site

2.0 Site Analysis

2.2 Site History

Historically, Commercial street, Newport has been an important vein linking Pillgwenlly and the early docklands of the River Usk to the commercial centre of Newport and became a street containing some of Newport's most important locations including the 1885 Newport Town Hall, the Westgate hotel (now Westgate Square), the Empire Hotel as well as several banks and department stores.

Since these times Commercial Street has become a buzzing hub of city centre activity. The Northern end of the street has been partially protected by the Town Centre Conservation Area.

The areas immediately surrounding the site is populated with a mix of various commercial and residential properties. Much of the Architecture present here is an eclectic mix of original late 19th century fashionable Queen Anne Revival style mixed with extensive modern additions dashed around irregularly .

A full heritage and historical analysis of no's 133 -135 Commercial Street can be found within - HERITAGE IMPACT STATEMENT by Holland Heritage.

2018 – 133-135 Commercial Street – Google Earth Image



Site Location Aerial Views (Copyright - Google Earth)

2.0 Site Analysis

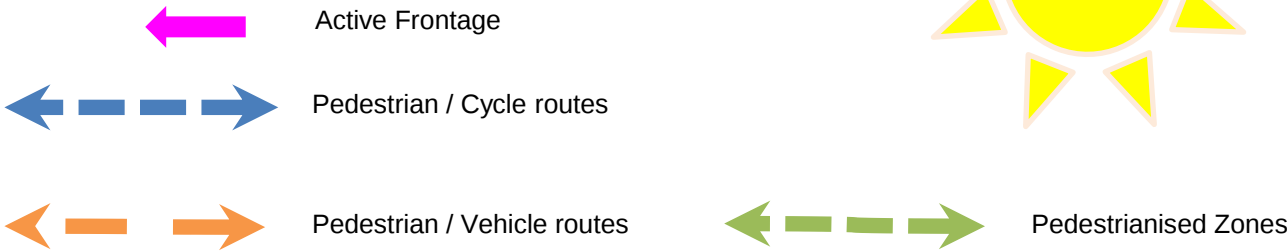
2.3 Existing Site Constraints & Opportunities

Site Constraints

- Existing service arrangements & Future Operational requirements.
- Prominent and busy main Commercial Street road site
- No vehicular access directly to the site
- The topography of the site - large difference in ground level running from the Commercial Street frontage to the access lane at the rear
- Height restrictions and overlooking to neighbouring properties
- Linking existing and proposed levels
- Complementing traditional 19th century with modern architecture

Opportunities

- Enhance the character and appearance of an existing site
- Extend active street up Hill Street
- Create much needed residential accommodation
- Create valuable new secure cycle parking spaces
- Accessibility & pedestrian connectivity
- Advanced safety of public areas
- Redevelopment of an underused site
- Sustainable Location
- Increase natural surveillance
- Create a new development that the community will use and validate



2.0 Site Analysis

2.3 Planning History

The various planning applications that were submitted to Newport City Council. Records start at 1990 to present.

90/0809 Change of use from Retail to Offices – 133, Commercial Street, Newport. GRANTED 20 Sep 1990

91/0014 Installation of internally projecting sign – 133, Commercial Street, Newport. GRANTED (with conditions) 18 Feb 1991

01/0327 Erection of internally illuminated fascia sign and projecting sign – 133, Commercial Street, Newport. GRANTED 29 May 2001

19/0105 Change of use from A1 to sui generis (Tattoo Studio) – 133, Commercial Street, Newport. GRANTED (with conditions) 28 Mar 2019

92/1208 Installation of new shopfront – 134, Commercial Street, Newport. GRANTED 29 Jan 1993

07/1236 Change of use to Insurance Brokers (A2) – Ground floor, 134, Commercial Street, Newport. REFUSED 06 Dec 2007

12/0003 Relocation of extractor fan – 134, Commercial Street, Newport. REFUSED 30 May 2012

16/1122 Partial discharge of condition 5 (door and windows) 134, Commercial Street, Newport. GRANTED 15 Dec 2016

93/0677 Installation of security grilles – Morris Cowan Ltd, 135, Commercial Street, Newport. REFUSED 27 Aug 1993

95/0675 Alteration of fascia board to hide roller shutters 135, Commercial Street, Newport. GRANTED (with conditions) 29 Sep 1995

01/0884 Installation of new security grille, housing and fascia pane, 135, Commercial Street, Newport. GRANTED (with conditions) 28 Sep 2001

03/0433 Installation of fascia illumination 135, Commercial Street, Newport. GRANTED (with conditions) 09 May 2003

2.0 Site Analysis

2.3 Planning History Continued...

The various planning applications that were submitted to Newport City Council. Records start at 1990 to present.

10/0725 Change of use from retail (Use Class A1) to financial and professional services , 135, Commercial Street, Newport. WITHDRAWN 24 Aug 2010

12/0137 Proposed change of use from A1 use class (Retail) to A2 use class 135, Commercial Street, Newport. REFUSED 05 Apr 2012

12/0583 Proposed change of use from A1 use class (Retail) to mixed A1 use class (Retail) and A2 use class (alterations to shopfront and tile cladding to elevations – 135, Commercial Street, Newport. GRANTED (with conditions) 06 Sep 2012

12/0925 Installation of 4 No. fascia signs, 2 No. projecting signs and 3 No. internal window vinyl signs, 135, Commercial Street, Newport. GRANTED 19 Dec 2012

12/0926 Installation of new shopfront including a new shopfront on Hill Street elevation Commercial Street, Newport. GRANTED (with conditions) 19 Dec 2012

13/0082 Partial Discharge of Condition 1 (External Tiles) of Planning Permission 12/0926 for installation of new shopfront including a new shopfront on Hill Street Elevation – 135, Commercial Street, Newport. APPROVED 21 Mar 2013

19/0127 Change of use of ground floor from mixed A1/A2 to sui generis (Beauty Clinic) 135, Commercial Street, Newport. GRANTED (with conditions) 09 May 2019

12/0003 Relocation Of Extractor Fan 134, Commercial Street, Newport REFUSED 30/05/2012

15/0379 Change Of Use Of Ground Floor Shop (Use Class A1) To Restaurant And Takeaway (Use Class A3) 133, Commercial Street, Newport GRANTED (with Conditions) 02/07/2015

19/0105 Change Of Use From A1 To Sui Generis (Tattoo Studio) 133, Commercial Street, Newport GRANTED (with Conditions) 28/03/2019

3.0 Context Analysis

3.1 Local Services and Amenities

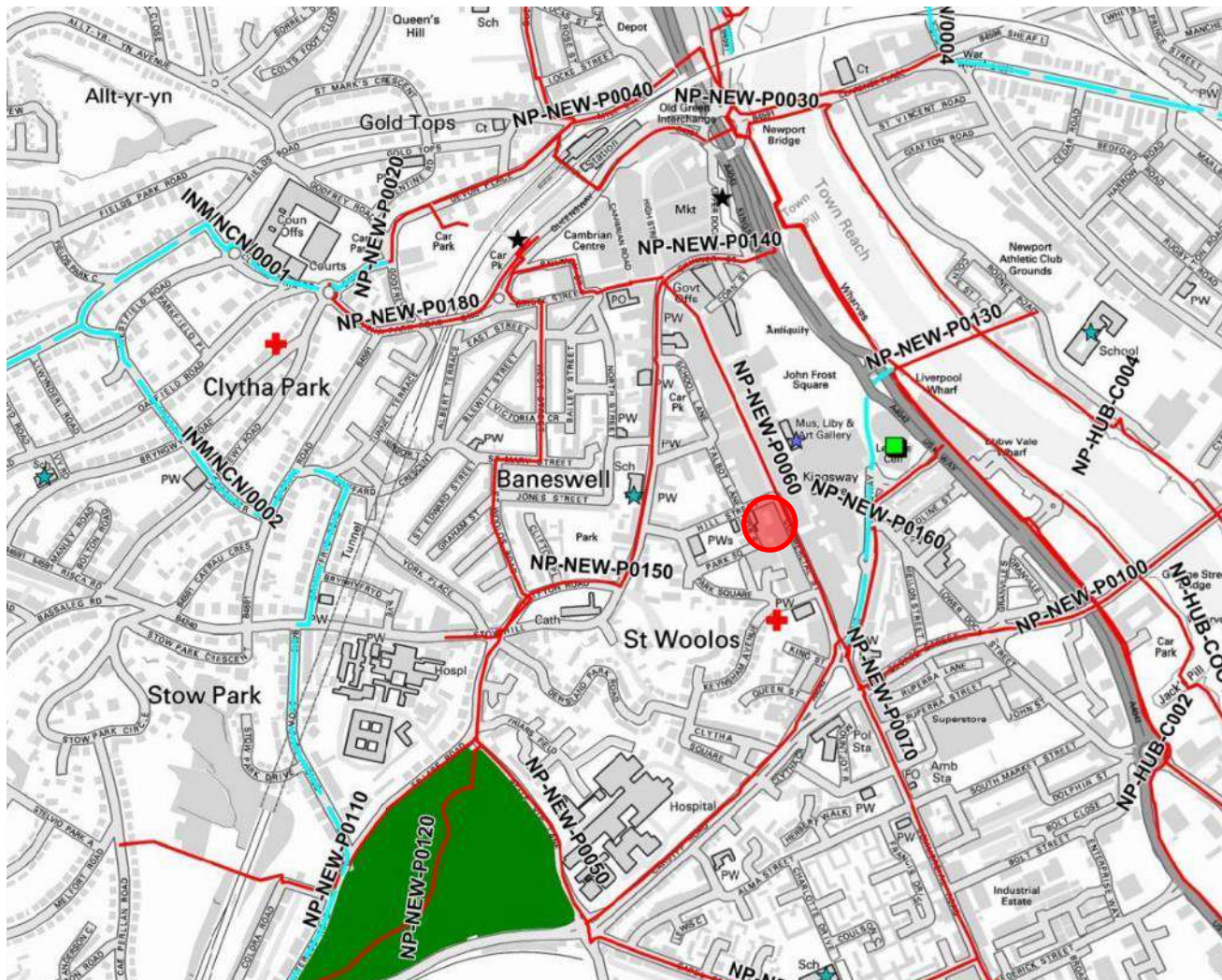
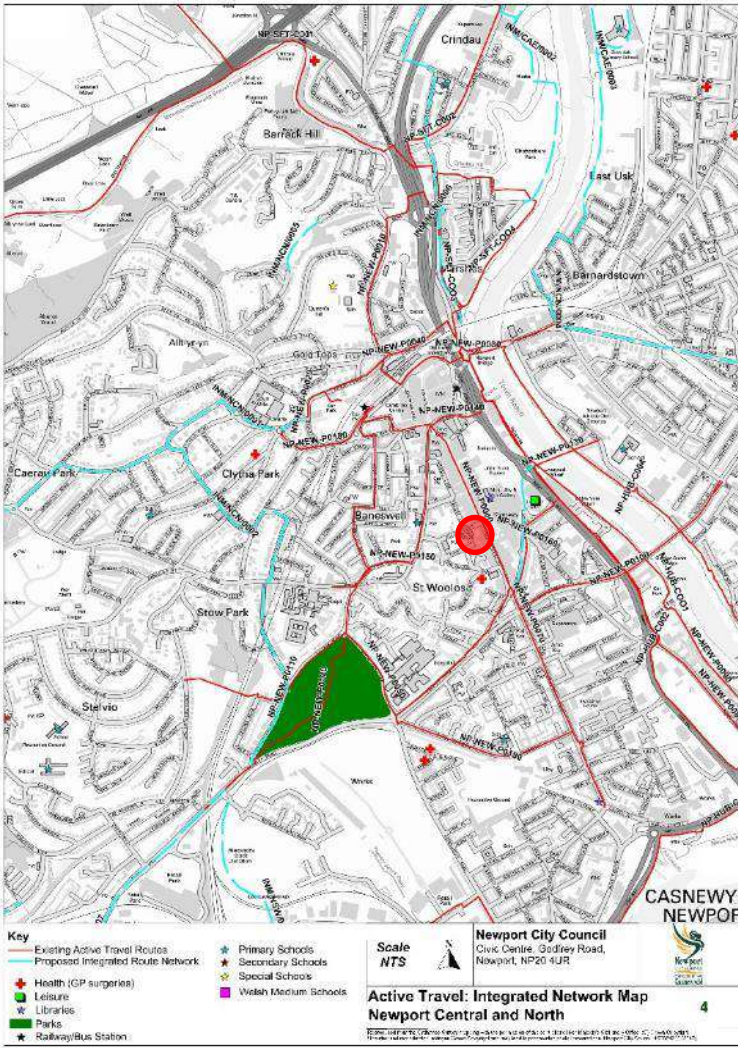
The main vehicle access to and from the site is via Commercial Street to the South East (the continuation of Commercial Street to the North is currently pedestrianised) and Hill Street to the West.

The Site sits directly on Commercial Street, this street has a wide variety of small independent shops, supermarkets and public houses which are all directly accessible from the property (walking distance). Furthermore, the new Friars Walk Shopping Centre / Restaurant Complex is another local amenity that is within a 6-8 minute walk away from the proposed site.

The Newport bus station located at Friars walk (0.4 miles - 6-8 minute walk) provides an excellent bus service, serving both local and national bus services.

The Newport Train station located at Queensway (0.5 miles - 8 minute walk) which also provides an excellent transport service, with trains serving both the local area, valley lines and national train services.

 = Site Location



Active Travel – Integrated Network Map (Copyright - Newport Local Transport Plan)

3.0 Context Analysis

3.2 Planning Policy

Pre-application discussions

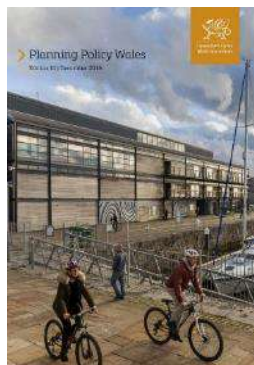
The following Design and Access Statement (DAS) aims to identify clearly and logically the objectives of the proposed development which have been considered from the outset.

Along with early collaboration with LPA for pre-application advice we have prepared this DAS to be read in conjunction with the full planning application submission documents.

The first pre-application advice from the LPA for this proposed development started in March 2019 and the follow up pre-application meeting on 14th of May 2019 and subsequent pre-application advice issued by Newport City Council on 26th June 2019.

Therefore this DAS is one element of a much larger body of work prepared for this planning application. It is imperative that this document is not read in isolation, the reader should refer to all the drawings and information prepared by M2M, along with support material prepared by the specialist consultants.

The following local & national planning policy documents have been consulted with the preparation of this development proposal:



Planning Policy Wales (PPW)

Planning Policy Wales (Edition 10, December 2018) (PPW), supported by the accompanying 21 topic based Technical Advice Notes (TANs), sets out the context for the Welsh Government's sustainable land use planning policies for Wales. As well as being used for the preparation of Development Plans and development control decisions throughout Wales.

In regards to Planning for Sustainability, PPW advises:

PPW paragraph 4.6.2 states that by promoting mixed use development in either urban or rural areas it can be an effective way to achieve regeneration.

Furthermore, PPW advises:

PPW paragraph 4.11.7 states that mixed use development, emphasising flexibility and adaptability, can provide particular design opportunities, adding interest and vitality to living and working environments.

Technical Advice Notes

The following Technical Advice Notes (TANs) have been considered in preparation to the proposed development:

- Technical Advice Note (TAN) 2: Planning and Affordable Housing (2006) - This document provides guidance on the role of the planning system in delivering affordable housing.
- Technical Advice Note (TAN) 4: Retail and Commercial Development (2016) - This document provides guidance on the role of land use planning in retail and commercial development.
- Technical Advice Note (TAN) 8: Renewable energy (2005) - This document sets out technical planning advice on use of renewable energy and sustainable design.
- Technical Advice Note (TAN) 11: Noise (1997) - This document provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development.
- Technical Advice Note (TAN) 12: Design (2016) - TAN 12 provides key objectives set out by the Welsh Assembly in respect of good and quality design factors.
- Technical Advice Note (TAN) 15: Development and Flood Risk (2004) - TAN 15 provides technical guidance which supplements the policy set out in Planning Policy Wales in relation to development and flooding.
- Technical Advice Note (TAN) 18: Transport (2007) - Describes how to integrate land use and transport planning. As well as Explaining how transport impacts should be assessed and mitigated.
- Technical Advice Note (TAN) 21: Waste (2014) - This document provides advice to facilitate the introduction of a comprehensive, integrated and sustainable land use planning framework with specific regard to waste management in Wales.

3.0 Context Analysis

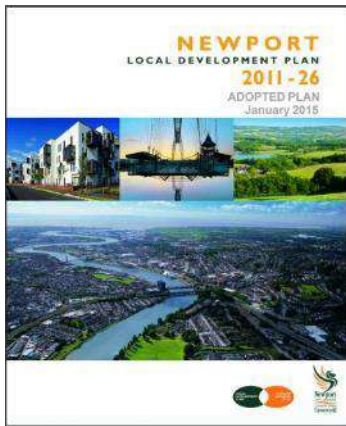
3.2 Planning Policy Continued...



People, Places, Futures: The Wales Spatial Plan - 2008 Update

This is a national plan for Wales, and was created with the intention of providing national economic and sustainable priorities and also help set a context for local planning and sustainable development through specifying key objectives for each of its sub-regions.

This document contains the primary land use planning policy for Wales. As well as advice on how planning decisions are made and why, and on what basis those decisions are arrived upon. With the intention of improving the quality and sustainability of future development and building in Wales, this document provides the planning policy framework set out by The Wales Spatial Plan.



Local Development Plan (LDP)

The applicable ‘development plan’ for the site is provided by Newport County Council’s Local Development Plan (LDP) 2011 - 2026.

The LDP policies listed below are considered relevant to the proposed site in discussion:-

- SP1 – Sustainability
- SP3 – Flooding
- SP13 – Planning Obligations
- SP18 – Urban Regeneration
- GP2 – General Amenity
- GP3 – Service Infrastructure
- GP4 – Highways & Accessibility
- GP6 – Quality of Design
- GP7 – Environmental Protection & Public Health
- H2 – Housing Standards
- H4 – Affordable Housing
- T4 – Parking
- W3 – Provision for Waste Management Facilities in Development
- CE7 – Conservation Area
- CE6 – Archaeology
- R1 – City Centre Schemes
- R3 – Non Retail Uses in Secondary City Centre Shopping Areas
- R4 – Non-Retail Uses in Other City Centre Shopping Areas

Supplementary Planning Guidance (SPG)

The SPG supplements Structure Plan Policy and seeks the regeneration of a degraded urban site

.

- Planning Obligations SPG – August 2015
- Affordable Housing SPG – August 2015
- Archaeology and Archaeologically Sensitive Areas SPG – August 2015
- Wildlife and Development SPG – August 2015
- New Dwellings SPG – August 2015
- Flat Conversions SPG – August 2015
- Parking Standards SPG – August 2015

3.0 Context Analysis

3.3 Sustainable Drainage (SuDS) Statutory Guidance

SAB Approval

The proposed development site is currently 100% impermeably surfaced, comprised of existing buildings and yard space.

It is proposed to construct a new residential apartment block which comprises 100% build out of the site, replacing any existing yard space with built form.

Several of the existing buildings, including the existing façade to Commercial Street, and the Annex building to the rear, on Hill Street will be retained.

The proposed development does not increase the impermeable surface across the site.

As per the Sustainable Drainage (SuDS) Statutory Guidance, SAB approval is not required for:

- Permitted development covering an area of land under 100 square metres,
- Developments with drainage implications of a single dwelling and the area of land covered by the construction work is less than 100 square metres, or
- In the case of any other type of construction work, the area of land covered is less than 100 square metres.

The Sustainable Drainage (Enforcement) (Wales) Order 2018 defines Construction Work as anything which has drainage implications:

“Construction Work has drainage implications if the building or structure will affect the ability of the land to absorb water.”

In our view the proposed development does not comprise of Construction Work which will have drainage implications. The area of impermeable surface across the site will not increase as a result of the development, and therefore the ability of the land to absorb rainwater is not affected, as per the Sustainable Drainage (Enforcement) (Wales) Order 2018.

3.0 Context Analysis

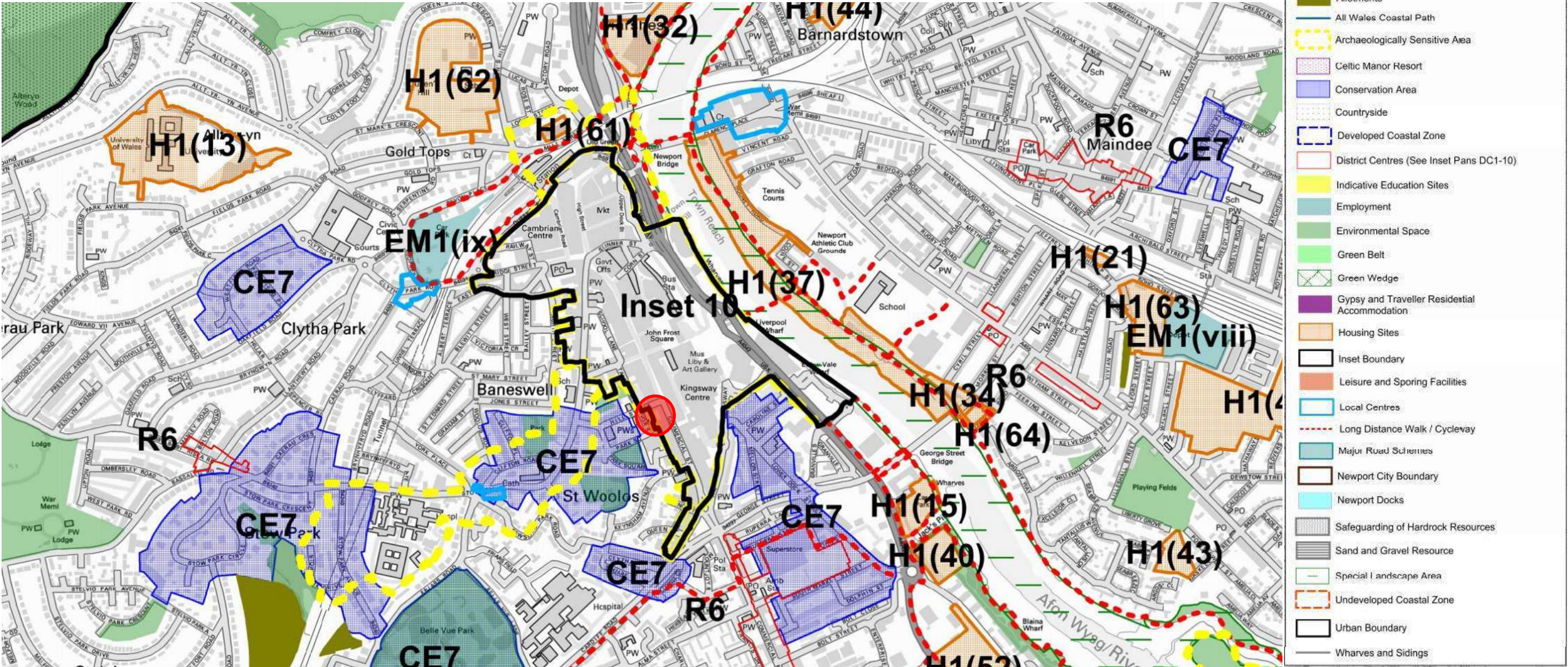
3.2 Planning Policy

Proposals Map Extract & Key

Environmental Spaces and Corridors	CE3
Archaeologically Sensitive Area	CE6
Conservation Area	CE7
Local Nature Reserve	CE8
Coastal Zone	CE9
Leisure and Sporting Facilities	CF1
Allotment	CF6
Celtic Manor Resort	CF9
Education Sites	CF13
Employment	EM1
Newport Docks	EM2
Housing Policies	H1
Gypsy and Traveller Residential Accommodation	H16
Safeguarding of Mineral Resource	M1, SP21
Wharves and Rail	M4
District Centres	R6
Local Centres	R8, R9
Urban Boundary	SP5
Countryside	SP6
Green Belt	SP7
Green Wedges	SP8
Special Landscape Area	SP11
Eastern Expansion Area	SP16
Major Road Schemes	T1
Proposed Railway Stations	T5
Long Distance Walk / Cycleway	



Newport Local Development Plan
2011-2026
Proposals Map - West
January 2015



Extracts (Copyright - Newport LDP 2011-2026:Proposals Map West & Key January 2015)

4.0 Objectives, Design Vision

4.1 Design Principles

Key Design Principles:

- High Quality residential apartments
- Active frontage – develop new commercial and existing retail frontage
- Revitalising tired rear annex and upper floor accommodation to a city centre site
- Community development – boost local integration

The aim is to create a new and effective mixed-use development that can regenerate and integrate with the already established surrounding community. Aiming to optimise the existing ground level retail opportunities and access points.

To provide the Kingsway area of Newport City with much needed key workers, affordable accommodation. - a mixture of 22 no 1 & 2 Bedroom Units.

To revive the old street façade to Hill Street and compliment the already established 19th century Georgian architecture surrounding the nearby area.

The key principle for the ground floor layouts was to design and retain the main active frontage to Commercial units to face onto Commercial Street while maximising the existing ground floor retail areas.

Many sketch schemes have been produced for this site, all of which have had to take into consideration the elongated shape of the site and the substantial difference in level between the front and rear of the site (commercial street - rear access lane) which is approx. 1.5m .

The development is to include 22 new residential apartments which will span over the four floor levels.



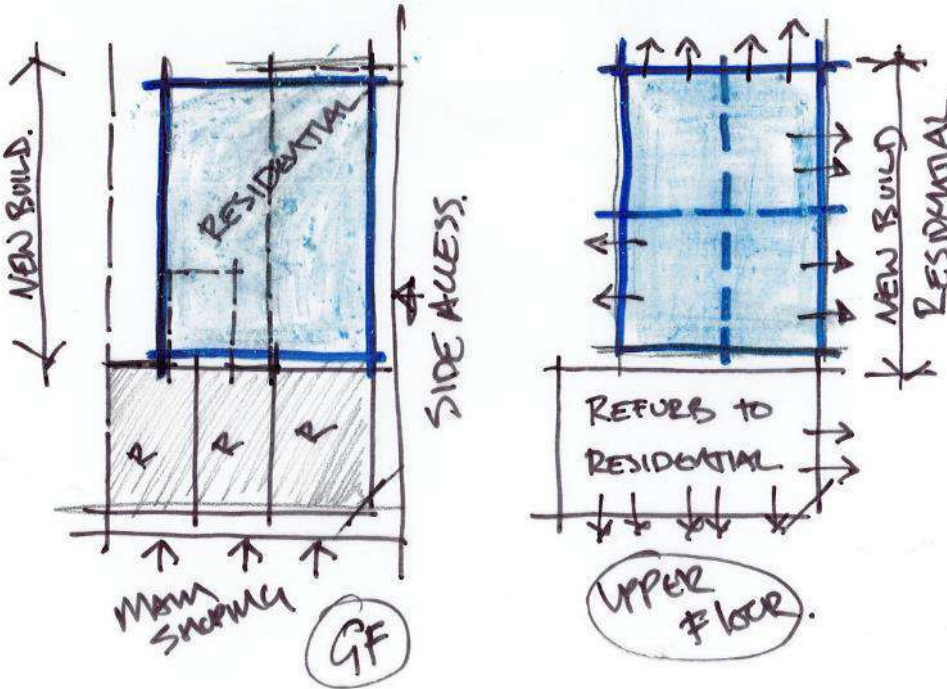
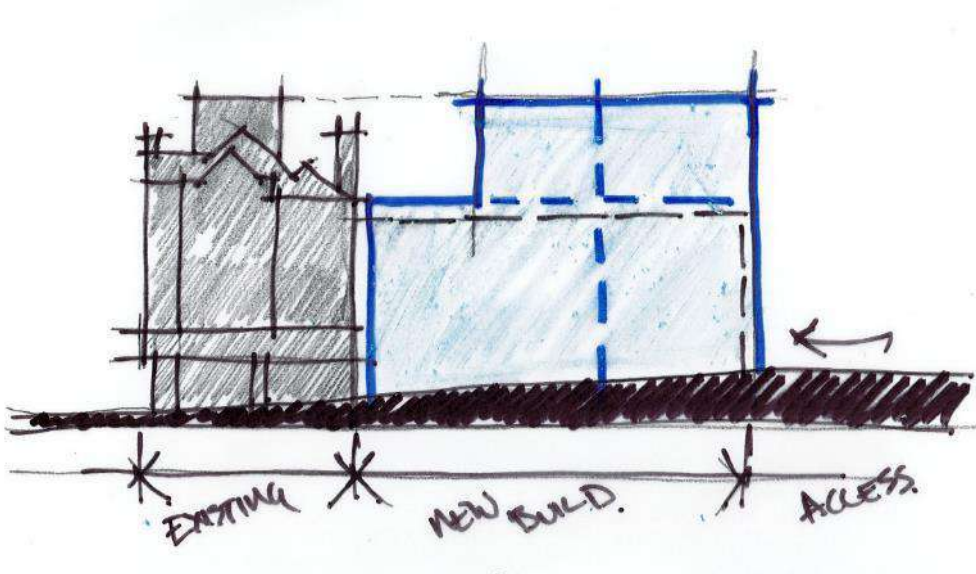
Early sketches - massing principle – Not to scale

4.0 Objectives, Design Vision

4.2 Design Development

Key design Objectives –

- Improve on the existing connection between the population of city key workers with the city itself
- Reducing the number of residential units from 29 as shown on pre-application (REF: P/19/00062) to 22
- Retain the main active frontage to Commercial units to face onto Commercial Street while maximising the existing ground floor retail areas.
- Provide easily accessed rear ancillary accommodation
- Providing the end user with a highly sustainable, high quality building.
- Redevelopment of an underused and disjointed building with in the city
- Incorporating a new contemporary style building that is sympathetic to the local vernacular giving the location a much needed lease of life.
- To provide appropriate levels of daylight to building users/residents.
- A symmetrical and architecturally balanced form of external appearance epitomised in window sizes and regular building lines.
- To enhance and compliment the already established 19th century Georgian architecture of the area.



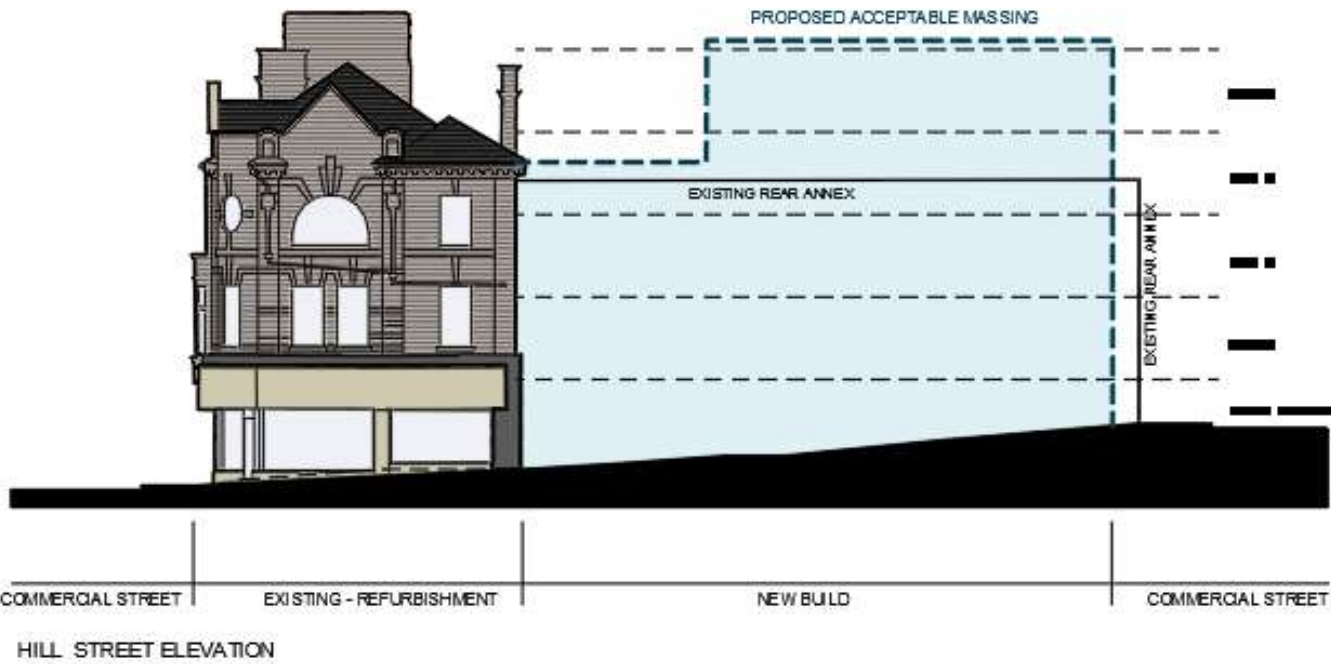
Early layout sketch principles – Not to scale

4.0 Objectives, Design Vision

4.2 Design Development

Initial Sketch Schemes - Proposed concept massing to the rear of Commercial Street

Early Scale Massing Modelling - Acceptable massing principle modelled to the rear of Commercial Street Retail - Hill Street Elevation



Early proposed concept layouts indicating existing locations of Retail, and best locations for ancillary uses and residential units - Proposed Ground Floor Plan & Proposed Typical Upper Floor Plan

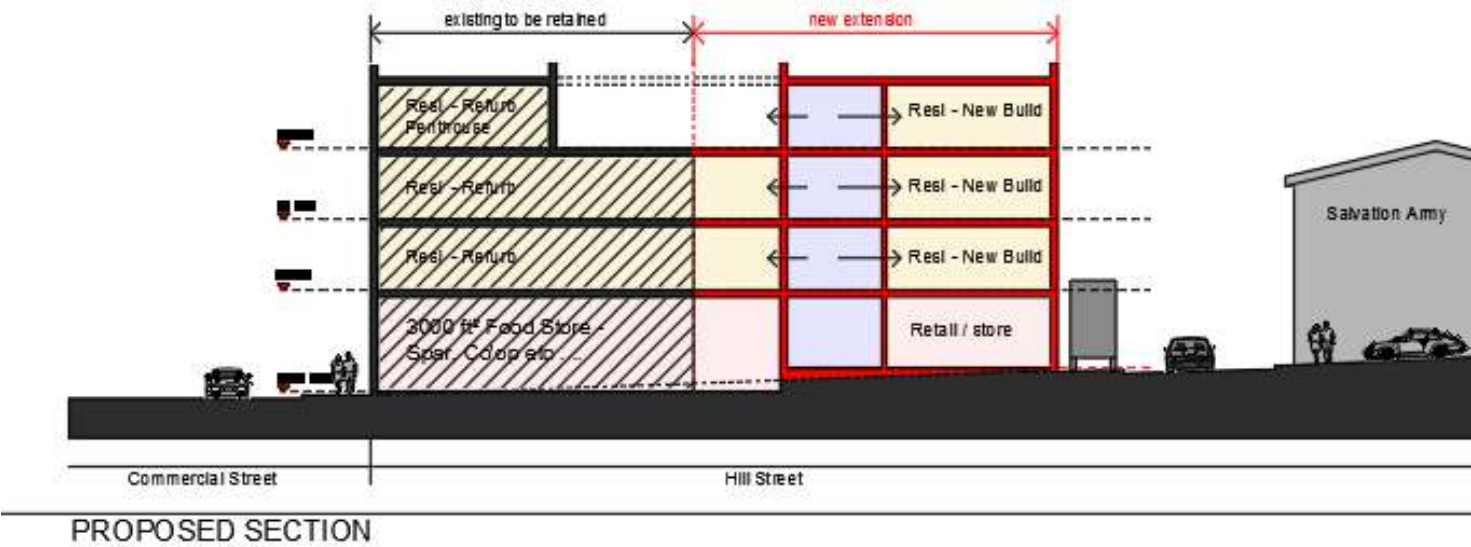


4.0 Objectives, Design Vision

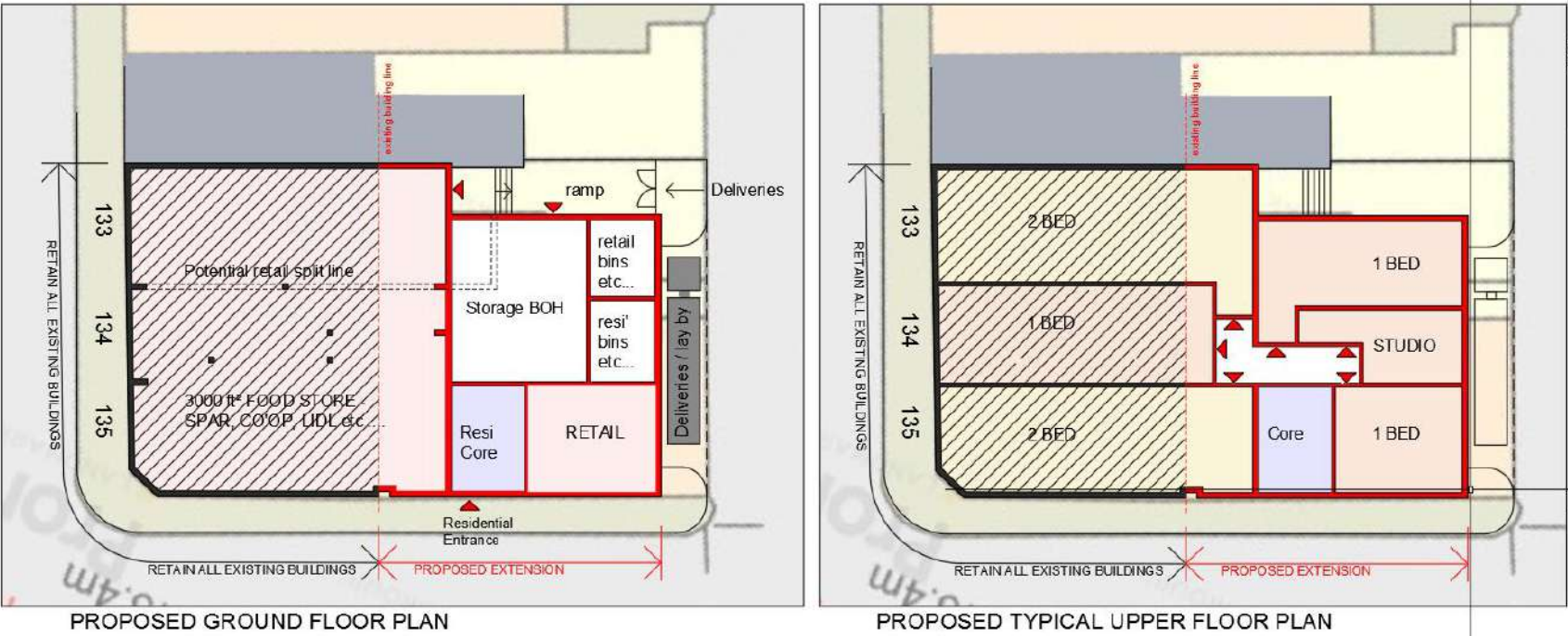
4.2 Design Development

Design Development - Proposed concept layouts to the rear of Commercial Street

Developed Massing Section - Showing the relationship between the retained and refurbished properties facing onto and Commercial Street and the New build rear annex - East to West Section



Developed concept layouts indicating existing locations of Retail, and best locations for ancillary uses and residential units and the relationship between the retained and refurbished properties facing onto and Commercial Street and the New build rear annex
Proposed Ground Floor Plan & Proposed Typical Upper Floor Plan



Early sketches - massing principle – Not to scale

4.0 Objectives, Design Vision

4.2 Design Development

Design Precedents

Design Development - Initial Façade Design Exemplars & Precedents



Modern Brick Bay Design & Detailing



Ordered Solid and Void



Ordered Brickwork Detailing



Asymmetric Bay Design



Ordered solid and void



Simple Opening Grouping

4.0 Objectives, Design Vision

4.2 Design Development

Design Development - Proposed concept Elevation Studies to the Proposed Hill Street Elevation



Full Height Massing - Central Vertical Split - Grouped Openings



Full Height Massing - Central Vertical Split - Grouped Opening
Top Floor Set Back



Full Height Massing - Central Vertical Split - Narrow Grouped Opening



Full Height Massing - Central Vertical Split - Narrow Grouped Opening

4.0 Objectives, Design Vision

4.2 Design Development

ORIGINAL Planning Pre-Application REF: P/19/00062

Discretionary Planning Pre - Application

Drawing Package

Proposed mixed use development at 133 - 135 Commercial Street, Newport

Comprising of Retail & Residential

133 - 135 Commercial Street
Newport
NP20 1LY
March 2019
M2M/3076/2019



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Aerial Location (Copyright - Google Maps)

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- PL - 203 - Proposed Third Floor Plan
- PL - 204 - Proposed Fourth Floor Plan
- PL - 205 - Proposed Roof Plan
- PL - 301 - Proposed H&I Street Section



133 - 135 Commercial Street, Newport



Ordnance Survey, (c) Crown Copyright 2019. All rights reserved. Licence number 100022432

Existing Site Location Plan

Site Location:
Site Area: 0.14 Ha
0.34 Acres



133 - 135 Commercial Street, Newport



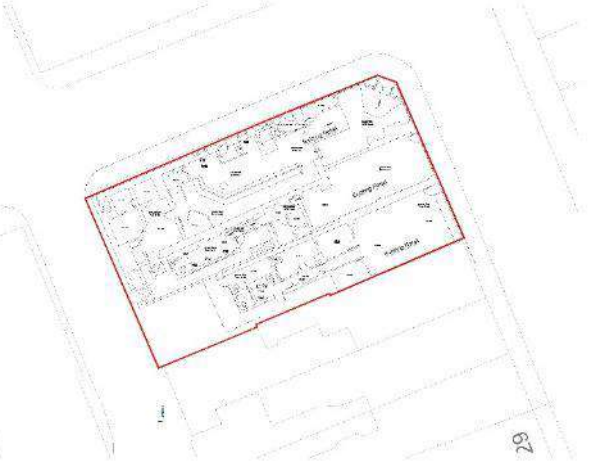
Existing Site Survey

Site Boundary: 0.14 Ha
0.34 Acres





133 - 135 Commercial Street, Newport



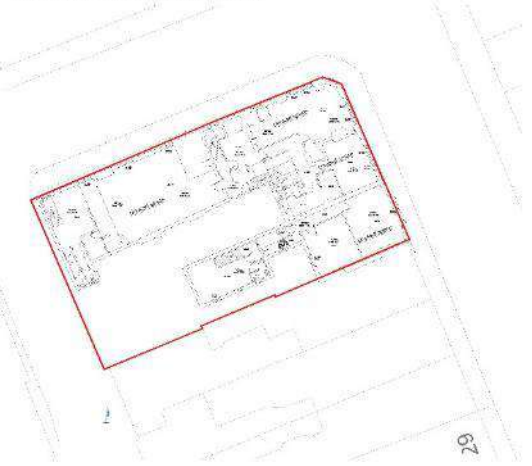
Existing Ground Floor Survey

Site Boundary: 0.14 Ha
0.34 Acres





133 - 135 Commercial Street, Newport



Existing First Floor Survey

Site Boundary: 0.14 Ha
0.34 Acres





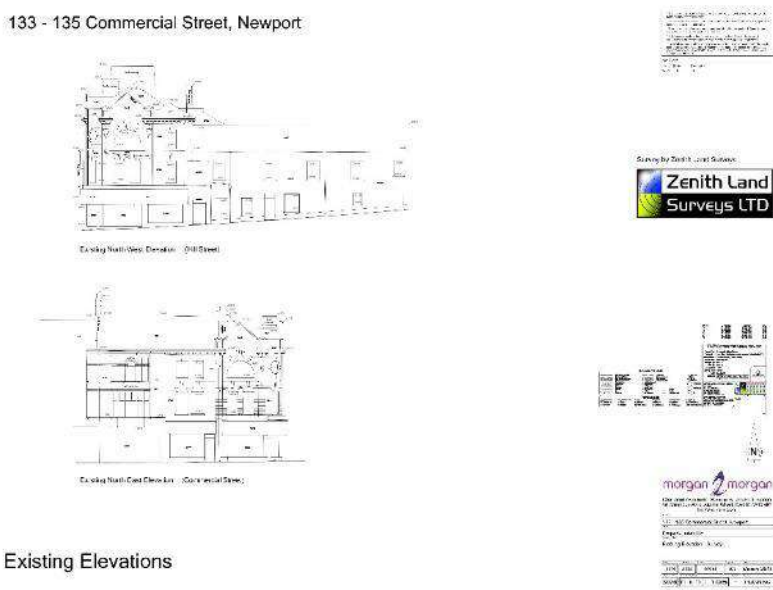
4.0 Objectives, Design Vision

4.2 Design Development

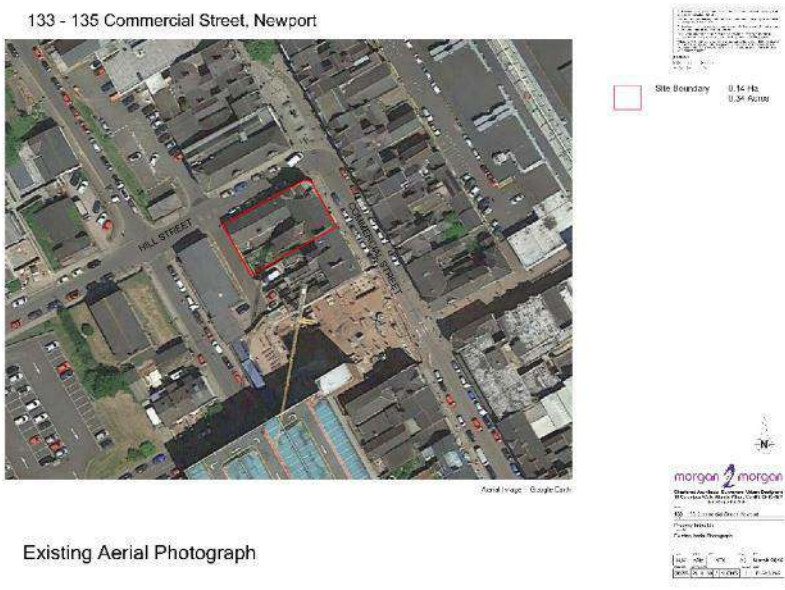
ORIGINAL Planning Pre-Application REF: P/19/00062



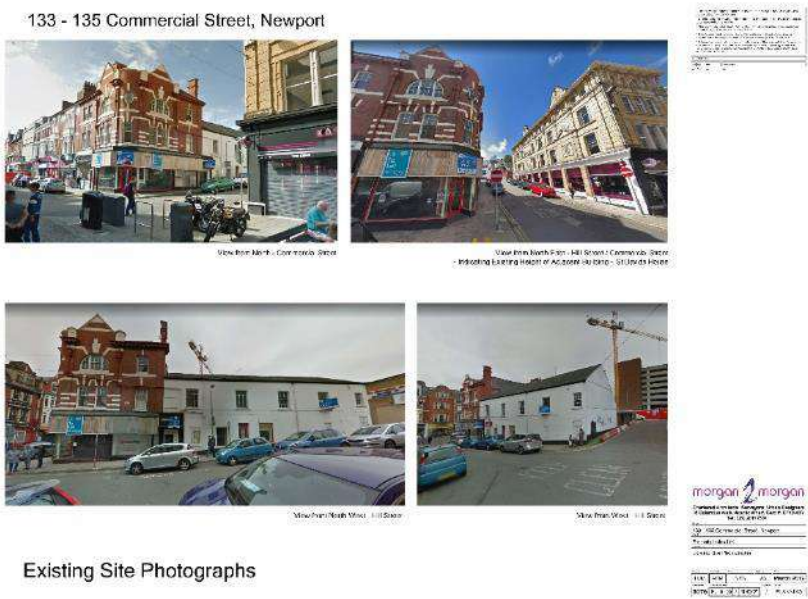
Existing Second Floor Survey



Existing Elevations



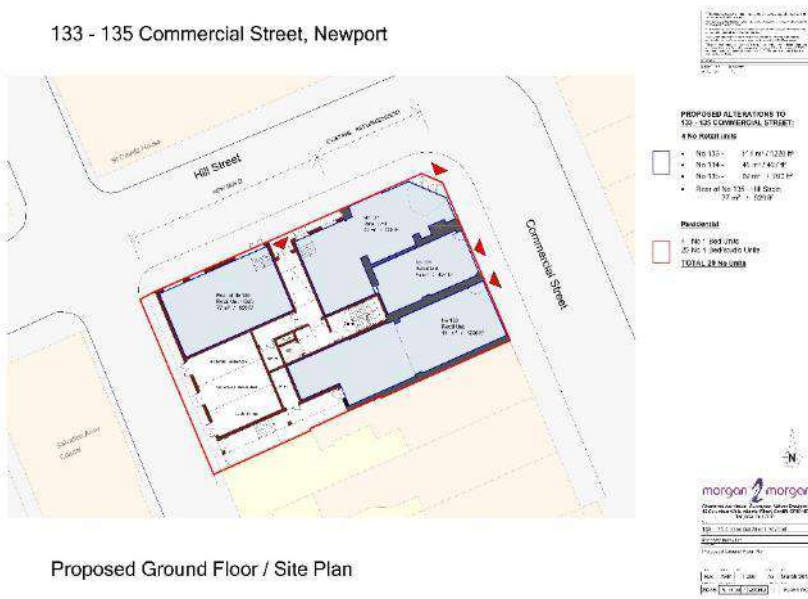
Existing Aerial Photograph



Existing Site Photographs



Existing Site Photographs



Proposed Ground Floor / Site Plan

4.0 Objectives, Design Vision

4.2 Design Development

ORIGINAL Planning Pre-Application REF: P/19/00062



134 - 135 Commercial Street, Newport



4.0 Objectives, Design Vision

4.2 Design Development

Planning Pre-Application - REF: REF: P/19/00062 - RESPONSE & MEETING with Eilian Jones - NCC PLANNING OFFICER 14.05.19

MAIN POINTS TAKEN FROM PRE-APPLICATION MEETING WITH NCC PLANNING OFFICER

Conservation

There is currently a conservation area review ongoing - this property may be included within the conservation boundary when this review is complete

Design

- The existing smaller two story part of the building on Hill Street is significantly important historically and was advised to retain half of the existing.
SEE SKETCH ELEVATION. P34
- Advised that the proposed height and massing is acceptable to the West end of the site (bookend) and behind areas,- however we are advised to retain the Eastern end of the existing rear annex .
SEE SKETCH ELEVATION. P34
- Advised the proposed new build annex to the rear needs to be more subtle and subservient design and detailing compared to the front building.
- The planner and conservation officer have requested we use bath stone coloured Stucco render detailing and bath stone style plinth where possible on the new build elements - reference buildings.
 - 14 Hill Street - Existing residential dwellings on Victoria Place - Existing residential dwellings along Stow Hill, Existing residential dwellings along Victoria Place
- Advised the style adopted for the new build showed potential, however a great deal of preference for Georgian style detailing and referenced the Cardiff Road Georgian Villas & Kingshill House Housing.
- Advised the layouts were acceptable; however a few of the units would need to be larger 35m² to meet the current SPG requirements.
- Advised that it would be desirable to incorporate roof gardens wherever possible on the proposed flat roof areas to provide some much needed and high quality amenity space
- City centre development, zone 1 - therefore no car parking required

4.0 Objectives, Design Vision

4.2 Design Development

Positive Pre-application Response - REF: REF: P/19/00062

Responsible Officer

Eilian Jones

Contact Ref

P/19/00062

Telephone

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Regeneration, Investment and Housing

Adfywio, Buddsoddi a Thai

Civic Centre/Canolfan Ddinesig

Newport/Casnewydd

South Wales/De Cymru

NP20 4UR

Newport

CITY COUNCIL

CYNGOR DINAS

Casnewydd

Mr. H. Mainwaring

Huw.mainwaring@m2architects.co.uk

27 June 2019

Dear Mr. Mainwaring

PROPOSAL: PRE-APPLICATION PLANNING ENQUIRY FOR MIXED USE DEVELOPMENT COMPRISING 4 NO. RETAIL UNITS, 29 NO. RESIDENTIAL UNITS AND 3 STOREY EXTENSION ABOVE EXISTING REAR PORTION OF BUILDING

SITE: Land Encompassing 133 To 135, Commercial Street, Newport

REF NUMBER: P/19/00062

I refer to your recent request for pre-application advice in respect of the above.

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal application. Please note that the views expressed in this letter and those during the site meeting held on 14 May 2019 represent officer opinion only and cannot be taken to prejudice any formal decision of the Council in respect of any application, on which a more extensive consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to officers.

Relevant Site History

135 Commercial Street

10/0725	CHANGE OF USE FROM RETAIL (USE CLASS A1) TO FINANCIAL AND PROFESSIONAL SERVICES (USE CLASS A2)	Withdrawn 24/08/2010
12/0137	PROPOSED CHANGE OF USE FROM A1 USE CLASS (RETAIL) TO A2 USE CLASS (FINANCIAL AND PROFESSIONAL SERVICES)	Refused 05/04/2012
12/0583	PROPOSED CHANGE OF USE FROM A1 USE CLASS (RETAIL) TO MIXED A1 USE CLASS (RETAIL) AND A2 USE CLASS (FINANCIAL AND PROFESSIONAL SERVICES, ALTERATIONS TO SHOPFRONT AND TILE CLADDING TO ELEVATIONS (RESUBMISSION FOLLOWING REFUSAL OF 12/0137)	

		Granted with Conditions 06/09/2012
12/0925	INSTALLATION OF 4NO. FASCIA SIGNS, 2NO. PROJECTING SIGNS AND 3NO. INTERNAL WINDOW VINYL SIGNS	Granted 19/12/2012
12/0926	INSTALLATION OF NEW SHOPFRONT INCLUDING A NEW SHOPFRONT ON HILL STREET ELEVATION	Granted with Conditions 12/12/2012
13/0082	PARTIAL DISCHARGE OF CONDITION 1 OF PLANNING PERMISSION 12/0926	Approved 21/03/2013
19/0127	CHANGE OF USE OF GROUND FLOOR FROM MIXED A1/A2 TO SUI GENERIS (BEAUTY CLINIC)	Granted with Conditions 09/05/2019
	<u>134 Commercial Street</u>	
12/0093	RELOCATION OF EXTRACTOR FAN	Refused 30/05/2012
	<u>133 Commercial Street</u>	
15/0379	CHANGE OF USE OF GROUND FLOOR SHOP (USE CLASS A1) TO RESTAURANT AND TAKEAWAY (USE CLASS A3)	Granted with Conditions 02/07/2015
19/0105	CHANGE OF USE FROM A1 TO SUI GENERIS (TATTOO STUDIO)	Granted with Conditions 28/03/2019

Site Constraints / Designations

The site is located within the city centre of Newport and more specifically, within the shopping centre. It is also located within an Archaeological Sensitive Area and lies within Zone B Flood Risk Area.

Relevant Policy Context and material considerations

Newport Local Development Plan 2011-2026 (NLDP).

Should an application be submitted then it would be assessed against the following policies (or relevant criteria of policies) in the NLDP:

- SP1 – Sustainability
- SP3 – Flooding
- SP13 – Planning Obligations
- SP18 – Urban Regeneration
- GP2 – General Amenity
- GP3 – Service Infrastructure
- GP4 – Highways & Accessibility
- GP6 – Quality of Design
- GP7 – Environmental Protection & Public Health
- H2 – Housing Standards
- H4 – Affordable Housing
- T4 – Parking
- W3 – Provision for Waste Management Facilities in Development
- CE7 – Conservation Area
- CE8 – Archaeology
- R1 – City Centre Schemes

- R3 – Non Retail Uses in Secondary City Centre Shopping Areas
- R4 – Non-Retail Uses in Other City Centre Shopping Areas

The NLDP can be viewed using the following link:
<http://www.newport.gov.uk/documents/Planning-Documents/LDP-2011-2026/LDP-Adopted-Plan-January-2015.pdf>

Supplementary Planning Guidance (Adopted)

- Planning Obligations SPG – August 2015
- Affordable Housing SPG – August 2015
- Parking Standards SPG – August 2015
- New Dwelling SPG – August 2015
- Fiat Conversions SPG – August 2015
- Archaeology and Archaeologically Sensitive Area SPG – August 2015
- Wildlife and Development SPG – August 2015

The above-mentioned SPG's can be viewed using the following link:
<http://www.newport.gov.uk/en/Planning-Housing/Planning/Planning-policy/Local-Development-Plan/Supplementary-Planning-Guidance.aspx>

Please be advised that the above is not an exhaustive list and that other planning policies, guidelines and material planning considerations may be applicable to your proposal. You will also appreciate that these documents can be subject to review and their content may alter.

Officer Assessment

Description of Proposal

The indicative plans demonstrate a scheme consisting of the redevelopment of the property known as 133-135 Commercial Street, Newport.

The ground floor of 133 is currently vacant, the ground floor of 134 appears to be a nail bar and the ground floor of 135 is currently divided into a vacant shop (A1) and a vacant professional service (A2). It is unclear as to the uses of the existing upper floors of the buildings.

It is proposed to provide 4no. commercial uses on the ground floor (3 x A1 and 1 x A1 or A3) and then a total of 29 residential units across the upper floors. The units would be in the following configuration:

First floor (7 x 1 bed studios and 2 x 1 bed flats)
Second floor (7 x 1 bed studios and 2 x 1 bed flats)
Third floor (6 x 1 bed studio)
Fourth floor (5 x 1 bed studio)

To achieve this, the proposal would involve a substantial extension by firstly demolishing the two-storey structures fronting Hill Street and various extensions at the rear of the buildings and then construct a 4 and 5-storey extension. The facades of the buildings facing Commercial Street and the junction of this street with Hill Street would be retained.

Principle of Development

The site is located within the defined settlement boundary. The retention of retail units on the ground floor and residential units above is considered acceptable, in principle, in this city centre location.

Planning Policy Wales encourages a mixture of uses in city centres, which would help to create an attractive and vibrant city centre. The A1 uses fronting the secondary shopping frontage would, in principle satisfy planning policy. The A1/A3 (café use) fronting Hill Street would be outside the secondary shopping frontage and as such, introducing a non-retail use on this street, is acceptable in principle. The inclusion of a number of residential units on the upper floors could be considered as promoting sustainable living and as such, this use is considered to be acceptable in principle.

Notwithstanding the above, the full acceptability of the proposal would be dependent on satisfying a number of detailed policies, guidelines and material planning considerations.

Housing and Planning Contributions

The Strategy and Development Manager (Housing) has been consulted with regards to the proposal and the following comments have been received:

There are quite a number of units being proposed in the building and I would suggest that not all meet the space standards required within the SPG. This number of smaller units are likely to have a greater turnover of tenants and would probably require a greater management presence. In view of the proposal being for the conversion of an existing building and the proposed units not achieving the required Welsh Government standards for affordable housing, I would confirm that a commuted sum would be required for the provision of affordable housing.

In addition to the above, the Council's Regeneration Manager has made the following informal comments, particularly with regards to the housing element of the scheme:

I have strong concerns from the outset whether this quality of development will be achieved by this scheme, given the very high density of units and likely tenure depend for the concentrated, single-person accommodation proposed. At present it is at odds with the general movement towards higher quality, sustainable accommodation seen across the city centre in developments such as 123-129 Commercial Street, Griffin Island and others and it is difficult to support it from a regeneration perspective as a result. Based on the indicative plans that have been submitted, the scheme is unlikely to be considered acceptable due to the poor design of the development, resulting in a detrimental affect on the visual amenities of the area and a substandard level of amenity attributed to the future occupiers of the apartments.

The Planning Contributions Manager has provided the following comments:

S106 planning obligations are based upon the following assumptions:

- An indicative proposal of 29 x 1 bed apartments;
- The leisure sums are based upon a policy compliant provision of affordable dwellings i.e 9 apartments (30% of the development);
- The following planning obligations are 'indicative' and subject to change, reflecting the nature of the pre-application enquiry.

Notwithstanding any requirements for Highways, Transportation and Ecology, the following planning obligations are required:

Affordable Housing

The Local Development Plan requires that 30% of the development (i.e. 9 apartments) would be affordable housing (at no more than 50% of the Acceptable Cost Guidance). Properties should be offered on a 'neutral tenure' basis providing opportunities for applicants to rent or part-purchase their home. The properties will be allocated through the Common Housing Register. All properties shall be constructed to at least the same specification as the open market units, including all internal and external finishes. They will all achieve the Development Quality Requirement, Lifetime Homes Standards and Secure by Design as specified by Welsh Government or such document updating or replacing the same.

In exceptional circumstances, a commuted sum in-lieu of on-site provision can be provided. Based upon the formula in paragraph 5.5 of the Affordable Housing SPG (2015), £102,950 would be requested for the provision of affordable housing in the City of Newport. This sum would be index linked to the RPI and paid in instalments (to be agreed)

Education

133 - 135 Commercial Street, Newport.

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One bed apartments are exempt from contributing towards education services. As such, no contributions are requested

Leisure
Owing to the surplus of 'informal' play provision within the Stow Hill Ward, no contributions are requested for 'Informal' play. However, there is a deficit of 'Equipped' and 'Formal' play provision. One bed apartments are exempt from contributing towards 'Equipped' play. As such, no contributions are requested for equipped play. As such, the proposed development generates an indicative commuted sum of £36,428 to upgrade and maintain off-site 'Formal' play serving the facility. All Leisure Sums will be index linked to the Retail Price Index and paid in instalments related to occupancy rates (to be agreed)

Developers/Owners must ensure "due diligence" in the acquisition of development sites i.e. land value should reflect LDP policy requirements. Also the above figures have been calculated based on the information provided. The Council reserves the right to review this matter at the time of a formal application in accordance with information and the policy context available at the time of submission.

Visual Amenity, Design and Impact on the adjacent Conservation Area
The property is particularly prominently located immediately outside the current boundaries of the Town Centre Conservation Area, and a short distance from the St Woolos Conservation Area. Therefore any proposed works to the external elements of the building will need to ensure that they preserve or enhance the character and appearance of the Conservation Area (for example views to and from the designated areas. In this regard, the informal comments of the Council's Conservation Officer (Heritage Buildings) are made:

Commercial Street is part a remarkable 19th century development. Along with its continuation into Commercial Road, it represents more than a mile of perfectly straight road, laid out for the purpose of connecting the expanding town of Newport and the fast-growing maritime and commercial district of Pilsenvenity. It is lined with a coherent collection of predominantly Victorian commercial buildings of generally similar scale, proportions, materials and richness of detail and, and remains remarkably intact. The application site consists of one such property, but the development would have a more major impact on a section to the rear, fronting Hill Street. This is of interest, as Commercial Street was actually laid out in the early 19th century, and very few buildings from its earliest years survive; the range to the rear has the scale and detail representative of this earlier period, and as such seems to be a rare illustration of the early development of the area.

The street also forms part of the wider setting of a number of listed buildings, with those closest to the application site being St Paul's Church to the south and numbers 46 and 142 Commercial Street to the north. A number of listed buildings are also concentrated towards the top of Hill Street.

Planning Policy Wales is clear that development proposals should seek to preserve or enhance the character of conservation area and that there should be a presumption in favour of preserving a listed building and its setting. Further guidance is offered within Welsh Government's Technical Advice Note 24, The Historic Environment as well as a suite of documents published by Cadw including "Conservation Principles", "Managing Conservation Areas in Wales", "Heritage Impact Assessment in Wales" and "The Setting of Historic Assets in Wales". Local Development Plan policy CE 7 concerns Conservation Areas and states that: Development within or adjacent to Conservation Areas will be required to:

- Be designed to preserve or enhance the character of appearance of the Conservation Area, having regard to the Conservation Area appraisal where appropriate.
- Avoid the removal of existing historic features, including traditional shopfronts and joinery.
- Use materials which are traditional, or appropriate to their context.
- Complement or reflect the architectural qualities of nearby buildings which make a positive contribution to the character of the area
- Pay special attention to the settings of buildings, and avoid the loss of any existing domestic gardens and open spaces which contribute to the character of the area.

- Avoid adverse impact on any significant views, within, towards or outwards from the Conservation Area.

The Town Centre and St Woolos conservation areas have recently been reviewed and draft Conservation Area Appraisals have been produced which contain further guidance. Whilst not yet formally adopted, these have been out to public consultation and therefore should be given weight in the planning process.

One of the recommendations of the appraisals is to extend the boundary of Town Centre Conservation Area along the length of Commercial Street to its junction with Cardiff Road. This would include the application property. Whilst the recommendations of this appraisal are not yet implemented, it is possible that by the time an application is submitted (or any development is commenced), the site will fall within the conservation area and thus Conservation Area Consent would be required for the demolition works proposed. This would need to be assessed in line with national guidance. Technical Advice Note 24: the Historic Environment provides the following relevant advice:

6.12 Applications for consent to demolish must be made to the local planning authority. Applicants for Conservation Area Consent will require a heritage impact statement, which should explain why demolition is desirable or necessary alongside a broader assessment of the impact of the proposals on the character or appearance of the area.

6.13 There should be a general presumption in favour of retaining buildings, which make a positive contribution to the character or appearance of a conservation area. Proposals to demolish such buildings should be assessed against the same broad criteria as proposals to demolish listed buildings (see 5.15). In cases where it is considered a building makes little or no contribution, the local planning authority will normally need to have full information about what is proposed for the site after demolition. Consent for demolition should not be given without acceptable and detailed plans for the reuse of the site unless redevelopment is itself undesirable. The local planning authority is entitled to consider the broad principles of a proposed development, such as its scale, size and massing, when determining whether consent should be given for the demolition of an unlisted building in a conservation area.

6.14 It may be appropriate to impose a condition on the grant of consent for demolition so that it does not take place until full planning permission has been granted and a contract for carrying out the development work has been made.

Paragraph 5.15, as referred to above, reads as follows:

An application for the demolition of a listed building should be made in exceptional circumstances and only as an option of last resort. Consent for demolition should not be given simply because redevelopment is economically more attractive than the repair and re-use of a historic building. The following factors need to be considered:

- The condition of the building, the cost of repair and maintenance in relation to its importance and the value derived from its continued use. Where a building has been deliberately neglected, less weight will be given to these costs.
- The efforts made to keep the building in use or to secure a new use, including the offer of the unrestricted freehold of the building for sale at a fair market price that reflects its condition and situation.
- The merits of the alternative proposals for the site, including whether the replacement buildings would meet the objectives of good design and whether or not there are substantial benefits for the community that would outweigh the loss resulting from demolition.

The building is currently vacant, and proposals to find a new use for it are in principle to be welcomed. Whilst the larger section to the corner of Commercial Road would remain unaltered, the proposals seek to demolish the range to the rear in order to replace it with a larger building in a more modern style. This causes considerable concern as this range is likely to be amongst the

earliest buildings in the area. I would recommend that any application is submitted with a Heritage Impact Assessment in line with the Cadw guidance "Heritage Impact Assessment in Wales" but, on the basis of the information available to me, I do not consider that the demolition is likely to be acceptable as it would fail to preserve the setting of the adjacent conservation area and, in the event that boundary amendments are carried out, fail to preserve or enhance the character of the conservation area itself.

However, the range is already altered and, as such, an amended scheme, possibly involving partial demolition could be acceptable. In particular, the ground floor of the building is heavily altered, having a modern shopfront to the front portion and devoid of historic window and door openings to the rear range. An informed scheme of restoration to the ground floor (and parts of the upper floor) elevations could potentially offset harm elsewhere. At our meeting, we discussed the possibility of enlarging a section to the rear of the building, whilst retaining a significant section showing the modest domestic scale of the original. I am of the opinion that a sensitively designed scheme of this nature could enhance the historic character of the area whilst still providing a commercially viable development. I have referred the architect to other historic buildings in the area from which inspiration might be drawn, in particular a property at 14 Hill Street which has recently had lined-out stucco render reinstated to authentic detail.

To conclude, whilst I do not consider the proposals to be acceptable in their current form, I hope that our pre-application discussions will lead to an appropriate alternative scheme.

Residential Amenity
The use of upper floors above commercial units can, in some respects, represent a highly sustainable method of living. This, in principle, is generally supported by the Council. However, any new residential development in a city centre location must have an appropriate standard of residential amenity for its future occupiers. Furthermore, any existing residential uses adjacent to the enquiry site must not be affected as a result of any redevelopment proposals.

With regards to the amenities of the future occupiers of the flats, consideration must be given to the type of commercial unit that would be located on the ground floor. Retail units tend to operate during daytime hours and are unlikely to raise any significant issues on the amenities of the occupiers of the flats above. There may, however, be a requirement to provide adequate noise insulation between floor and control opening times of the commercial unit. Other uses, for example, a hot food and drink establishment (A3), could cause greater amenity issues (such as smells, odours, noise and disturbance), especially in the evenings and at night. It is also acknowledged that there may be adverse impacts from adjacent commercial units. As such, to ensure future occupants of the dwellings are not disturbed by noise from traffic or neighbouring uses, any formal application submitted must be accompanied by a noise survey which may require a scheme of acoustic glazing and ventilation. It is also advisable that you consider your proposal against advice contained within Technical Advice Note (Wales) 11: Noise. A supporting statement should also be submitted to demonstrate, how matters of smells, odours and impact of existing and adjacent commercial units would be addressed to demonstrate how the future occupiers of the development would not be adversely impacted upon.

Supplementary Planning Guidance: Flat Conversions requires the following internal space standards:

	Size (sqm)
1 bed studio	35
1 bed flat	45 (converted) / 50 (new)

Several studio flats within the scheme would fall below the standards of the SPG. Also some flats would not have an appropriate level of amenity. In the absence of any justification as to why the Council should accept lower space or amenity standards, the proposal is likely to be considered unacceptable.

In this regard, the studio flats in the new structure facing the courtyard above 133 Commercial Street would have a poor level of amenity and could result in unreasonable overlooking with the 1-

bed flat in the converted part of the building. All flats must benefit from an adequate level of amenity with emphasis on ensuring that all habitable rooms have adequate light, outlook and privacy, configured in a manner which maximises the space within rooms and avoiding a cramped and gloomy living environment. Where standards cannot be met, the Council may not support the proposal unless robust justification is provided.

Any side windows on the elevation facing the rear of other properties on Commercial Street should not result in loss of privacy or amenity to neighbouring occupiers. The impact of the massing and scale of the new development upon neighbouring buildings could also result in loss of amenity should they include sensitive and/or vulnerable uses. For example, it would appear that 132 Commercial Street contain flats and careful consideration would need to be given to impact of the development upon this and other properties in the immediate vicinity. A similar exercise was undertaken during the consideration of the planning application for the large development at 123-129 Commercial Street and you are advised to examine the contents of this application (16/0788) to determine the scope and level of information needed to accompany your formal application.

It is also noted that none of the flats would benefit from any outdoor space. Whilst this is undesirable, this alone is unlikely to be determining factor provided that the overall level of amenity for future occupiers is acceptable. Nevertheless, having regard to the scheme submitted, there are opportunities where windows on public facades could include patio doors and small balconies (Juliet-style or platforms), whilst roof gardens could be provided at first, third and fourth floors.

It may be more appropriate to design a scheme with fewer flat numbers, to have larger flats and for all habitable rooms* ("definition within the SPG) benefiting from windows that either face Commercial Street, Hill Street or the rear access lane. This would coincide with the views of the Strategy and Development Manager (Housing) and the Council's Regeneration Manager whereby there is preference for a scheme with lower density, of greater mixture (for example a combination of 1 and 2 beds) with focus on spaciousness, quality and high standard of amenity. This is reinforced by the comments made by the Conservation Officer where the scheme should be designed around existing key buildings rather than significant demolition and construction. I appreciate that viability may influence the above factors, but the Local Planning Authority must consider schemes which have a positive contribution to Placemaking - a concept which is prevalent in Planning Policy Wales Edition 10.

In addition to the above, the following informal comments have been received from the Head of Law and Regulation (Public Protection):

Any formal application will require further information to enable a full assessment to be made upon the impact of the development/uses upon future occupiers of the flats and those living in neighbouring properties. In this regard, the following further information will be required:

General
The applicant needs to provide further information about the four proposed retail units, so that any potential impact from noise, odour, waste or light from business operations can be assessed prior to development, in order to protect the future residents of the above residential units and other existing residents in the vicinity.

- What type of business will occupy each of the units? Will there be outlets selling hot food? Late night take-away? Full details are required.
- What are the proposed operating hours of each of the retail units?
- Further information is required of any proposed fixed plant or equipment to be installed to serve each of the retail units e.g. fume extraction systems, air conditioning units,
- Deliveries to serve the retail businesses – what are the proposed delivery days and times and where will deliveries be loaded or unloaded on site?

Noise Assessment
No information has been provided assessing the potential noise impact from road traffic or nearby adjacent commercial uses including deliveries and plant / equipment on the proposed residential units to be built. The applicant will also need to consider any potential commercial noise from the

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four proposed retail units to be located on the ground floor of the development that could also have an impact on existing residents in the vicinity.

I therefore recommend that in order for this section to make an informed comment the applicant should submit a full noise assessment to assess any potential noise impact of the above mentioned noise sources on future and existing residents in the vicinity. The report should include, if appropriate, measures to be applied to mitigate excess noise impact.

The report shall be prepared by a person with appropriate acoustic qualifications and should be with full regard to all relevant guidance including BS8233:2014 - Guidance on Sound Insulation and Noise Reduction for Buildings and BS4142:2014 Methods for rating and assessing industrial and commercial sound.

For your information i have copied our standard planning conditions below to show the requirements that the applicant's noise assessment will need to demonstrate can be met:

i) Road Traffic Noise – Internal

No development, other than demolition, shall commence until a scheme has been submitted to and approved in writing by the Local Planning Authority to provide that all habitable rooms exposed to external road traffic noise in excess of 55 dBA Leq 16 hour [free field] during the day [07.00 to 23.00 hours] or 45 dBA Leq 6 hour [free field] at night [23.00 to 07.00 hours] shall be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night. The submitted scheme shall ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated without opening windows. No dwelling shall be occupied until the approved sound insulation and ventilation measures have been installed to that property in accordance with the approved details. The approved measures shall be retained thereafter in perpetuity.

Reason: To ensure that the amenities of future occupiers are protected.

ii) Plant and Equipment Noise

Noise emitted from plant and equipment located at the site shall be controlled such that the rating level, calculated in accordance with BS4142 2014, does not exceed a level of 5dB below the existing background level, with no tonal element to the plant.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.

Noise Insulation

The applicant will need to ensure that there is adequate sound insulation to the floor/ceiling structure between each of the retail units and first floor residential units, in order to ensure that future residents do not experience any noise disturbance from the business operations on the ground floor.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.

Fume Extraction

If food outlets preparing and selling hot food are proposed on the ground floor of this development, the following condition may apply at full application stage regarding suitable fume extraction systems to be installed:

Fumes from the food preparation areas shall be mechanically extracted and the extraction system shall be provided with de-greasing and de-odourising filters. Details of the extraction equipment (including scaled schematics, location plans, odour & noise attenuation measures and future maintenance) shall be submitted to and approved in writing by the Local Planning Authority prior to its installation, and the equipment shall be installed in accordance with the approved details prior to the commencement of use for the cooking of food.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected and in the interests of visual amenities.

Construction Environmental Management Plan (CEMP)

A Construction Environmental Management Plan (CEMP) will need to accompany any full application, details of our standard condition is listed below for the applicant's information,

Prior to the commencement of development, to include demolition, a Construction Environmental Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Construction Environmental Management Plan shall identify the steps and procedures that will be implemented to minimise the creation and impact of noise, air quality*, vibration, dust** and waste disposal resulting from the site preparation, groundwork and construction phases of the development and manage Heavy Goods Vehicle (HGV) access to the site. Measures to minimise the impact on air quality should include HGV routes avoiding Air Quality Management Areas and avoid vehicle idling. The approved Construction Environmental Management Plan shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.

* The Institute of Air Quality Management <http://iaqm.co.uk/guidance/>

** The applicant should have regard to BRE guide 'Control of Dust from Construction and Demolition, February 2003

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.

Waste

Policy W3 of the NLCP requires all developments to make provision for waste and recycling storage facilities. The following informal comments have been received from the Head of City Services (Waste Manager):

We observe that there is a refuse store for both residential and commercial waste accessible from a lane off Hill Street.

We have no access issues to the stores as the area is serviced already by an existing vehicle. We would request dimensions of the bin store to ensure that the store is large enough to house and manoeuvre bins.

The bin store should be large enough to house at least 3 x 1100litre bins (allowing for 120 litre capacity for residual waste per residential unit) and recycling. 1100 litre bins will be chargeable against the developer/ management company.

In addition to the above, the Head of Law and Regulation has also provided the following informal comments on waste:

The applicant will need to provide detail of the proposed waste storage and recycling facilities that will serve the future residential development. Further information will also be required regarding waste storage and means of disposal of waste to serve each retail unit. The following conditions may apply at full application stage;

i) Waste Storage and Recycling

Prior to first beneficial use, a scheme for the provision of waste storage and recycling shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be implemented prior to first beneficial use and thereafter maintained for the duration of the use.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.

ii) Waste Management Plan

Prior to first beneficial use a waste management plan, detailing the means of disposal of all waste generated by the business, shall be submitted to and approved in writing by the local planning

authority. The approved plan shall be implemented prior to first beneficial use and shall be retained for the duration of the use.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.

Highways and Transportation

Whilst the proposal is unlikely to provide any space for off-street parking, the site is located within a highly sustainable location, namely the city centre and in close proximity to Park Street Car Park. In this regard, the site is within Zone 1 parking area, as defined by Supplementary Planning Guidance: Parking Standards. This Zone does not require any off-street parking spaces due to its city centre and highly sustainable location. Notwithstanding the above, it would be necessary to ensure that the development does not have a detrimental effect on vehicle/pedestrian visibility from other adjacent sites. Also since the site is within the city centre, ensuring public safety is paramount, particularly during the demolition and construction phases. As such, the proposal is likely to require the submission of a Construction Environmental Management Plan (CEMP).

Drainage, Flooding and Utilities

Whilst the site is located within a Zone B flood risk area, Technical Advice Note 15 does not, in principle, preclude residential development in this zone. It is unlikely that any survey work or a flood consequences assessment would be required. Any application submitted for development must include a comprehensive drainage scheme, showing how foul and surface water would be controlled

Dŵr Cymru Welsh Water is a statutory consultee in the planning process and we would encourage all developers to engage with Welsh Water as early as possible in order to address any issues that may arise during the planning/construction process. Dŵr Cymru operates a pre-planning advisory service in order to assess the impact of the proposed development on drainage interests and a written response will be provided. This service operates for a fee and can be submitted via an online enquiry form at <http://www.dwrcymru.com/en/Developer-Services>. Further information can be obtained from the dedicated team of planning officers at Dŵr Cymru on 0800 917 2652.

From 7th January 2019 developments (whether permitted development or not) with a construction area of 100square metres or more or more than 1 dwelling*, will require the prior approval of the Sustainable Drainage Approving Body (SAB) to a system of sustainable drainage to serve the project. This is mandatory and projects cannot lawfully commence without such approval.

The process of obtaining SAB approval is separate to the planning application process. The granting of planning permission does not convey approval to sustainable urban drainage systems and a separate application to the SAB will be required. Applicants for projects that meet or exceed the above thresholds are advised to obtain early professional drainage advice in relation to this matter.

*exemptions include construction areas less than 100 sqm, existing sites with planning permission prior to 7th January 2019; sites for which a valid planning application has been received by 7th January 2019; and sites for which outline permission has been granted by 7th January 2019 and an associated reserved matters submission is made by 7th January 2020.

The site is within the city centre and other services and utilities necessary to accommodate residential development appear to be in close proximity.

Ecology

It appears that the site contains buildings which are vacant and parts of the structure may be accessible for use by bats. In this regard, the application site shares similar characteristics to those buildings recently demolished at 123-129 Commercial Street which contained bats. As such, you are advised that a bat survey of the building would be required to determine the presence of bats or any other protected species.

Archaeology

The site lies within an Archaeologically Sensitive Area and the informal advice of Giamorgan Gwent Archaeological Trust (GGAT) should be sought. Regard is given to previous comments of GGAT with regards to the redevelopment of 123-129 Commercial Street which required significant demolition and ground works In this respect, GGAT recommended various archaeological

mitigations, including desk-based assessments and archaeological watching briefs. Since the proposed development will also involve demolition and ground works in the Archaeologically Sensitive Area, it is considered likely that archaeological mitigation would be required.

E-planning

We strongly encourage you to submit your applications to the planning department online via the 'Planning Portal' (www.planningportal.gov.uk). This will save money on printing costs and travelling/postage together with speed up the processing of your submission. You can attach drawings and supporting documents, including a professional quality site location plan; downloading the appropriate Ordnance Survey map and calculate the fees as part of submitting your application online.

Building Regulations

You are advised that the proposed development will require building regulations consent. The Building Control Department of the Council offers a helpful and highly efficient and competitive service. For further information, please contact building_control@newport.gov.uk.

Conclusion

The indicative plans demonstrate a scheme consisting of the redevelopment (including demolition and substantial extensions) of the property known as 133-135 Commercial Street, Newport. It is proposed to provide 4no. commercial uses on the ground floor (3 x A1 and 1 x A1 or A3) and then a total of 26 residential units across the upper floors.

The retention of retail units on the ground floor and the inclusion of a non-retail unit outside the secondary shopping frontage with residential units above is considered acceptable, in principle, in this city centre location. Notwithstanding the above, the full acceptability of the proposal would be dependent on satisfying a number of detailed policies, guidelines and material planning considerations.

The key issues associated with the proposal have been conveyed during the meeting and within this letter. Whilst the scheme is broadly supported in principle, it is unlikely to preserve or enhance adjacent Conservation Areas with the Conservation Officer indicating the proposals is unlikely to be acceptable in its current form. Informal advice however has been provided regarding an alternative scheme which may have a more positive outlook on design, conservation and heritage matters.

The submitted scheme is also likely to be detrimental to the amenities of future occupiers of the flats and could harm the amenities of neighbouring properties. Careful consideration will need to be given to the compatibility of ground floor and neighbouring uses with the residential element of the scheme and the preference for a scheme with lower density, of greater mixture with focus on spaciousness, quality and high standard of amenity. The scheme, as presented, is unlikely to contribute positively to Placemaking and Improvements will be required to residential amenity with additional advice provided by the Head of Law and Regulation (Public Protection).

The site is located within a highly sustainable location, and does not require any off-street parking. Whilst this is unlikely to result in any highway objection, measures will be required to protect highway/pedestrian safety.

A range of survey work is likely to be require to accompany with any formal application, with particular regards to conservation/heritage, archaeology, ecology, drainage, noise and site levels. The proposal is also deemed to be a major application and, as such, will require pre-application community consultation (PAC).

While the Council will endeavour to keep pre-application enquiries confidential you should be aware that if for any reason any request for submitted information to remain confidential is subsequently found to be inadequate by the Information Commissioner, following any request under the Freedom of Information Act 2000, the Council will not be held responsible.

4.0 Objectives, Design Vision

4.2 Design Development

Design Development Post -Pre-application Design Precedents and Exemplars - Local Georgian Vernacular



Georgian Villa - Kingshill, Stow Hill, Newport



Georgian Terrace Townhouses - Clifton Place, Newport



Georgian Terrace Townhouses - Clifton Place, Newport



View of the existing residential Georgian Townhouses on Victoria Place



View heading East along Stow Hill towards Hill Street



Victoria Place to the West of the Proposed Site

4.0 Objectives, Design Vision

4.2 Design Development

Design Development Post -Pre-application Design Precedents and Exemplars - Local Georgian Vernacular



Georgian Townhouses - Stow Hill, Newport



Georgian Townhouses - Stow Hill, Newport



Georgian Terrace Townhouses - Clifton Place, Newport



View of the existing residential dwellings on Park Square



View of the existing Georgian Townhouses on Victoria Place



Georgian Villa - Kingshill, Stow Hill, Newport

4.0 Objectives, Design Vision

4.2 Design Development

Elevational Development from original Planning Pre-Application REF: REF: P/19/00062

Revised Pre-Application and Detailed Planning Design



North West (Hill Street) Elevation Design Development

ORIGINAL Pre-Application Elevation Design



North West (Hill Street) Elevation Design Development

Sketch made and agreed at pre-application discussions 14.05.19

4.0 Objectives, Design Vision

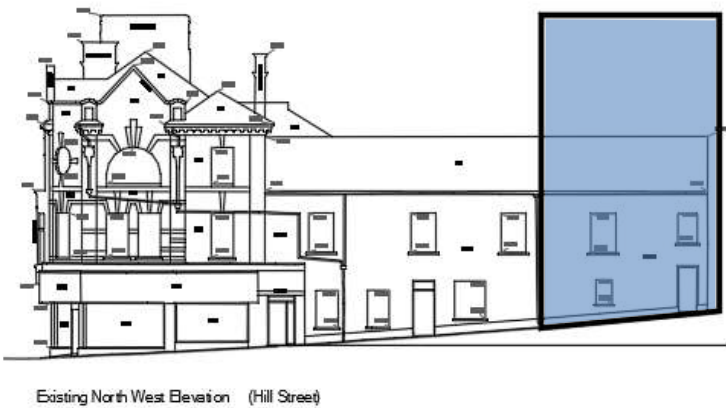
4.2 Design Development

Elevational Development from original Planning Pre-Application REF: REF: P/19/00062

Revised Pre-Application and Detailed Planning Design



North West (Hill Street) Elevation Design Development
Sketch made and agreed at pre-application discussions 14.05.19



North West (Hill Street) Elevation Design Development
Elevation Survey Showing Potential Development Extents



North West (Hill Street) Elevation Design Development
Post pre-application Design Elevation

4.0 Objectives, Design Vision

4.3 Proposed Scheme



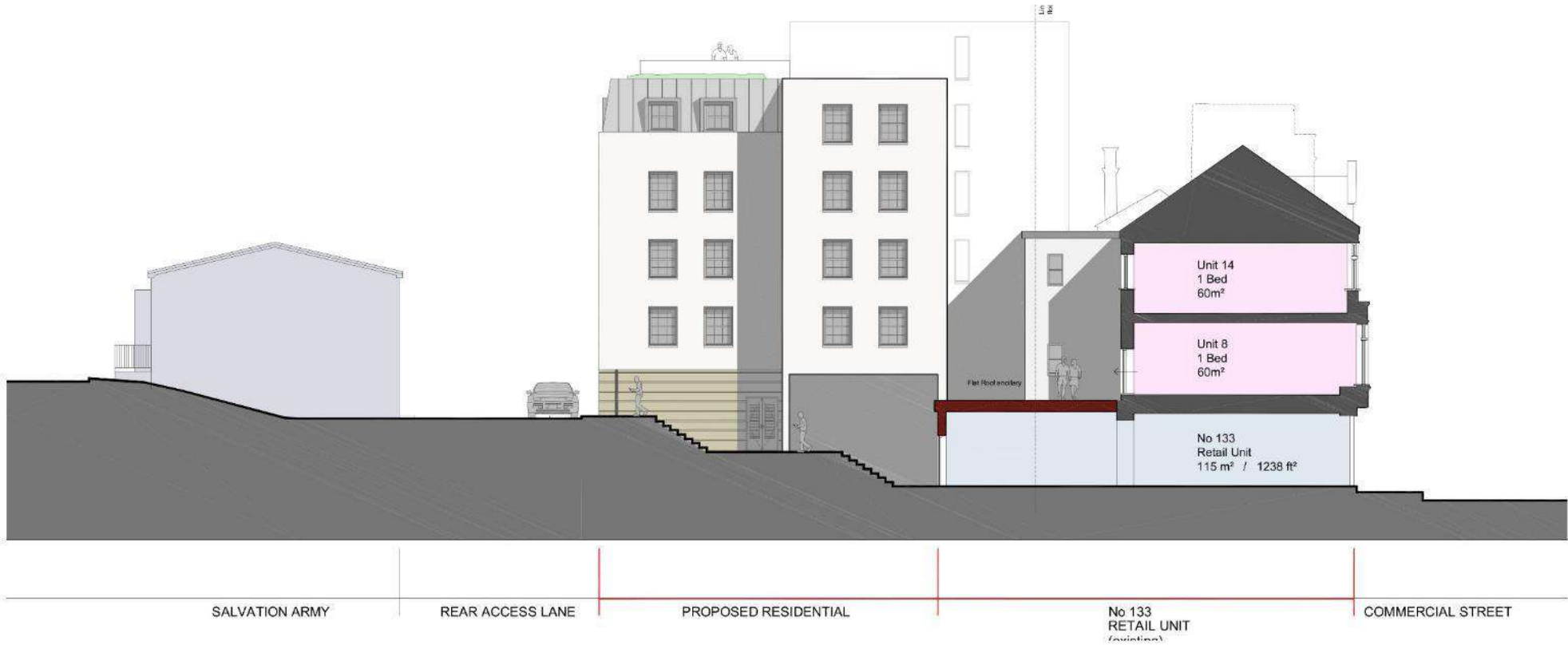
Proposed North West Context Elevation



Proposed North East Context Elevation

4.0 Objectives, Design Vision

4.4 Proposed Scheme



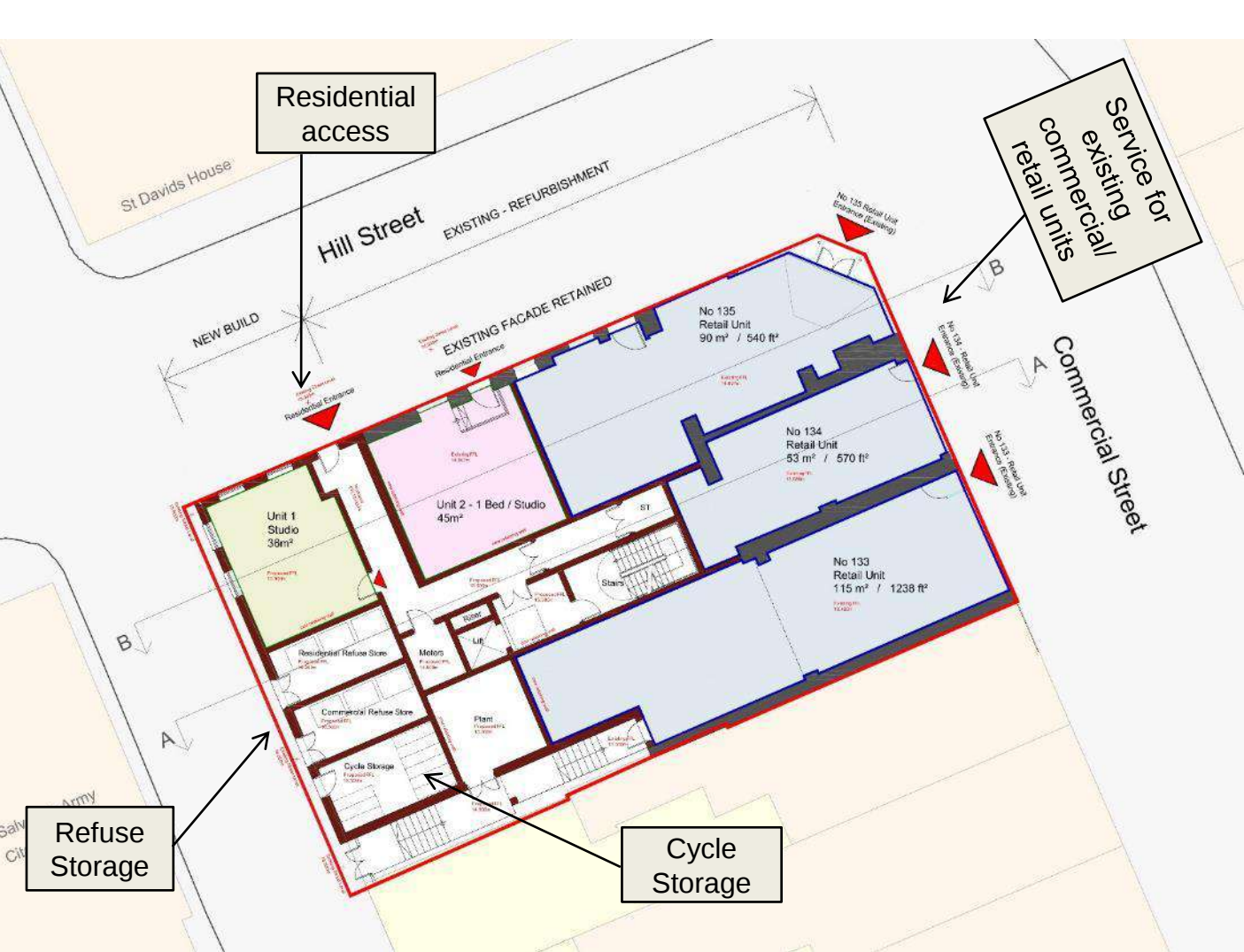
Proposed South East Context Elevation



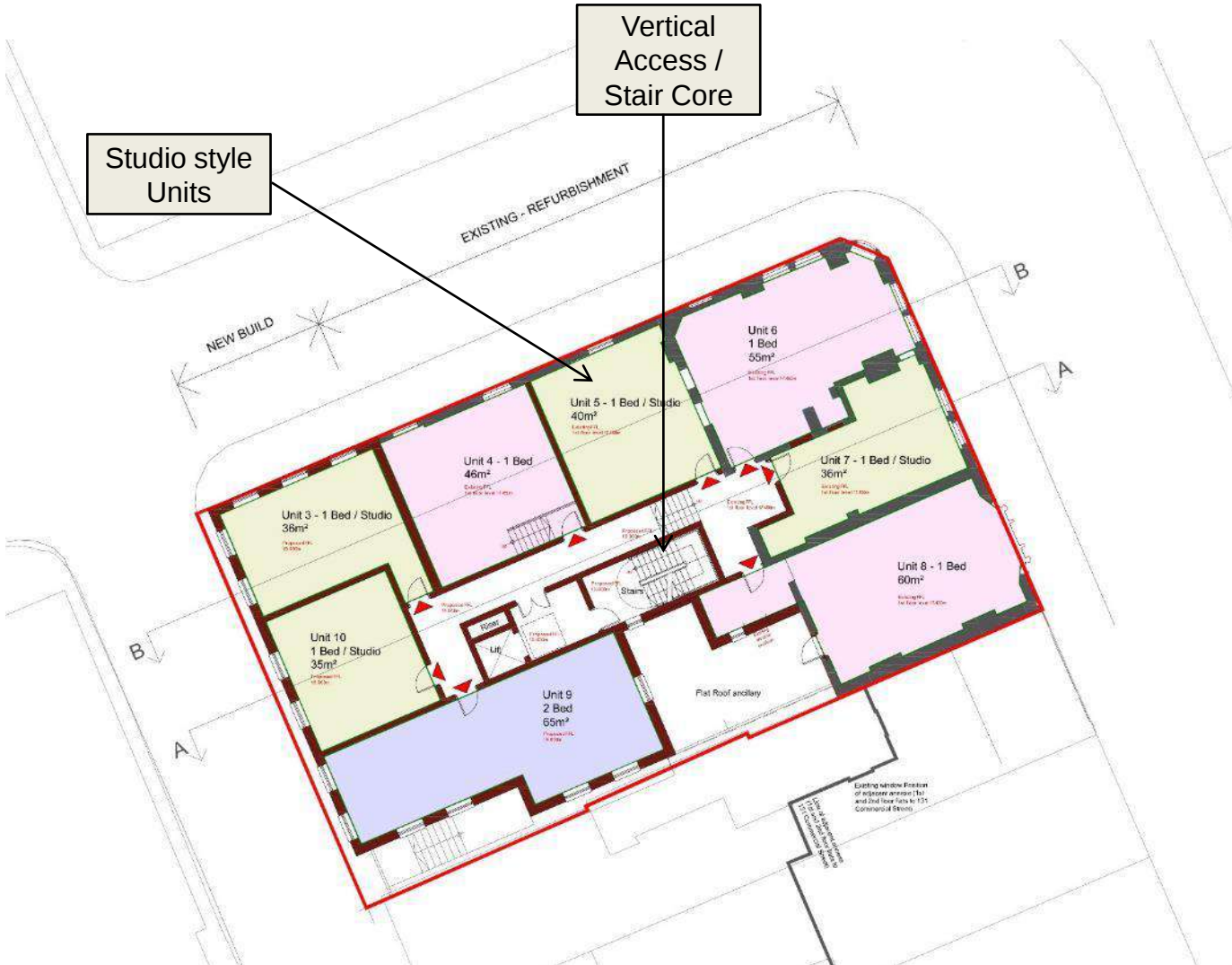
Proposed South West Context Elevation

4.0 Objectives, Design Vision

4.3 Proposed Scheme



Proposed Ground Floor / Site Plan

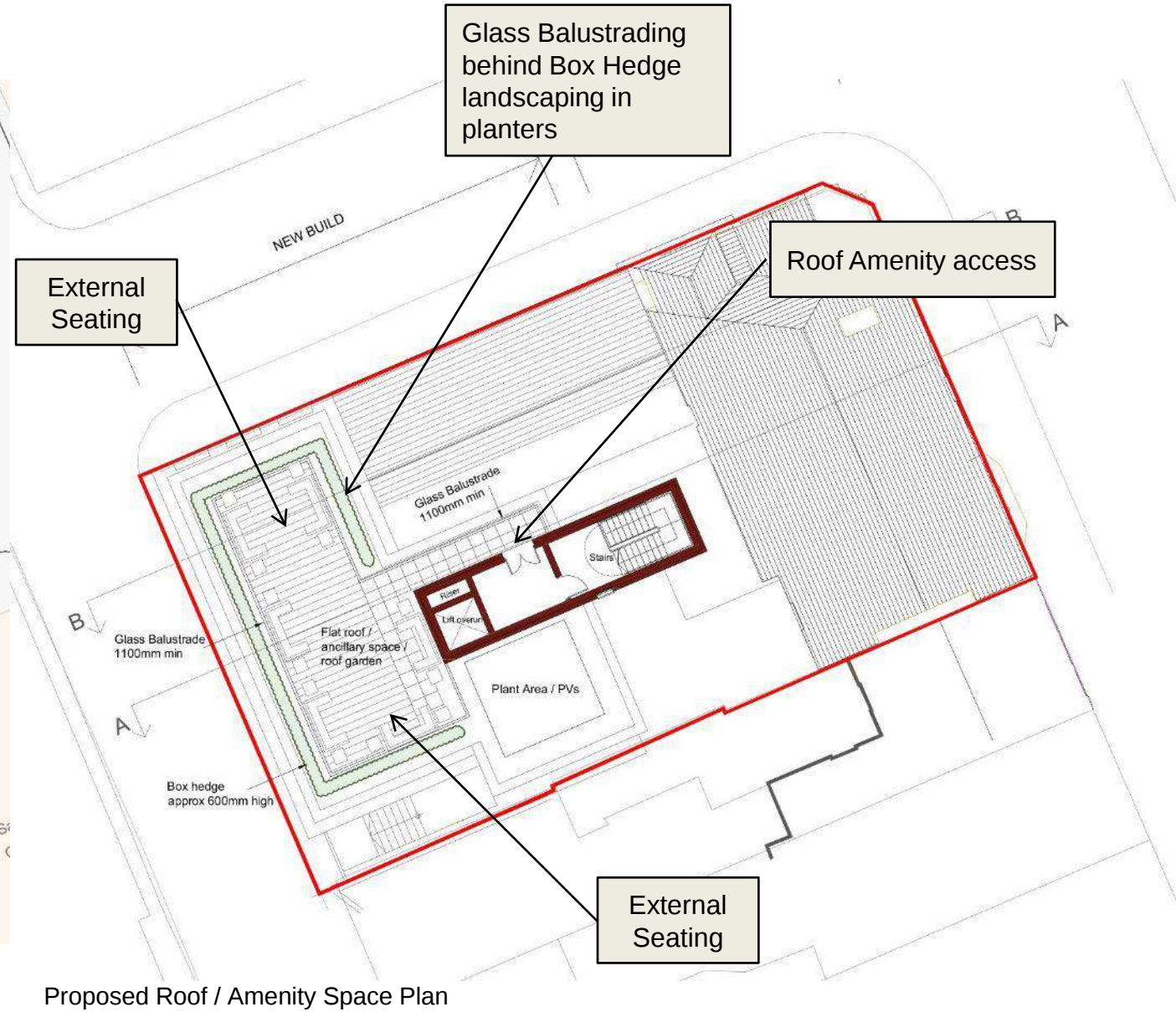


Proposed Typical Upper Floor Plan



4.0 Objectives, Design Vision

4.3 Proposed Scheme



Proposed Roof / Amenity / External Seating and Rooftop Landscaping Examples

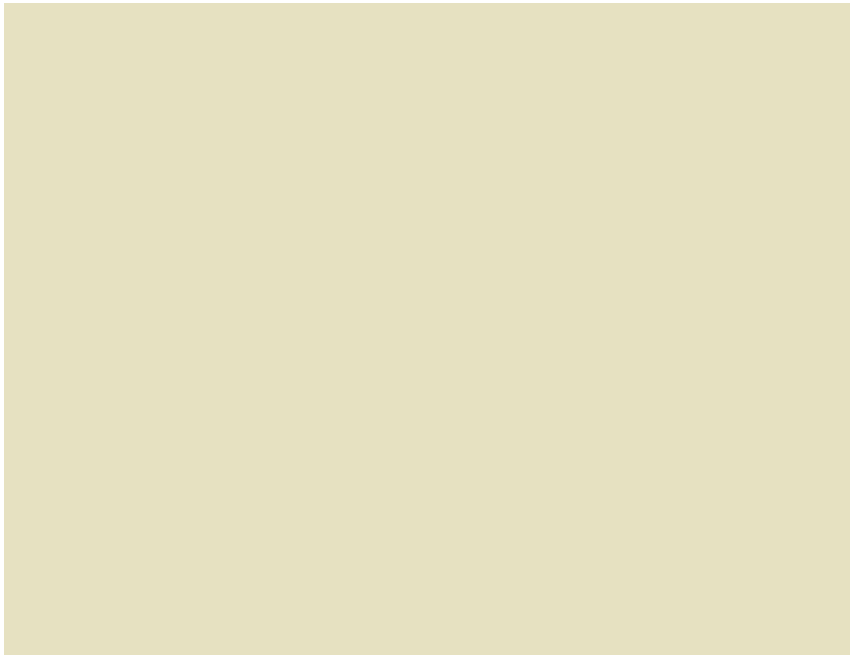
4.0 Objectives, Design Vision

4.4 Proposed Scheme

Materials



Ground Floor - Stucco render with scored/ Banded to replicate Ashlar stone work (as Victoria Place)
Colour: Light Buff TBC (as Victoria Place)



External Wall - Smooth Render to match existing Hill Street Elevation
Colour: Painted off white / cream to match existing



Preformed mansard dormers.
Colour: Charcoal grey (Matt) TBC



Rear Access - External Quality - Vertical tanalized timber enclosure - Painted & weather proofed



Plant room louvre door - PPC aluminium door & frame, balcony trims, flashings and drips by curtain walling / window specialist to match Colour: Dark grey



Roof - Metal standing seam mansard roof with preformed mansard dormers.
Colour: Charcoal grey (Matt) TBC

5.0 Design & Access

We have aimed to follow the principles set out in the Guidance notes of TAN 12; the 5 objectives to good design are:

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

5.1 The Proposal

The proposed development consists of :-

- 22 Residential Apartments
- 3 Commercial ground floor units
- 10 No. cycle spaces (1 stand per 5 bedrooms)
- Demolition of existing building structures

5.2 Character & Context

The intention is to create a new and effective mixed-use development that can regenerate and integrate with the already established surrounding community.

The proposed mixed use building that consists of a mixture of one bed, two bed and studio apartments together with the existing retail / commercial units.

The design of the facade onto Hill Street aims to reinforce the already established strong fronted facades local common to the St Woolos, Kings Hill and Stow Hill areas of Newport.

The development ranges from 4 to 5 storeys, 1 storey higher than St David's House across Hill Street (currently SEWREC & Kaspas Desserts).

The pavement along both Hill Street and Commercial Street on the Northern and Eastern boundaries of the site is to be maintained. All 3 existing ground floor retail units will retain a good direct pedestrian access from the existing pavement.

The proposal aims to continue the values of the Newport LDP design principles along its connecting street frontages and pedestrian routes.

5.2.1 Massing

The massing for the proposal has developed through discussions with the Local Authorities Officers as part of the planning pre-application process and discussion.

The proposal is to be 1 storey higher than St David's House across Hill Street (currently SEWREC & Kaspas Desserts).

5.2.2 Scale

The design proposal has been scaled up appropriately to be in keeping with the adjacent Newport City Centres surrounding buildings.

The proposed building scale is larger than that of which currently exists. However, the current use of the site appears to be underused and under achieving its future prospective.

The reduction in the no. of units from 29 to 22 has seen the overall scale of the design decrease and now conforms to the local area established standard.

5.0 Design & Access

5.2.3 Layout

The layout of the proposed development has been carefully considered as to minimize the impact the development upon the adjacent properties, whilst maximising the opportunities presented at the site.

The proposed layout of the site needs to unify both the existing surroundings of the site, and the proposed development response to the existing urban and physical grain. By providing a mixed use building in this area will make up for the loss of both the existing commercial unit and residential dwelling.

The revised proposal from the pre-application stage has been careful to retain the existing building line of the Hill Street elevation. In addition, adheres to the pre-application response to the amenity standards for ambience to the neighbouring dwellings.

The Ground floor layout is planning to retain the three existing commercial units to Commercial Street and house two residential apartments to Hill Street. In addition to the unit and apartment space there is to be a core area designed for the vertical circulation to the upper floor apartments and roof amenity space together with both residential and commercial refuse storage, cycle storage and plant rooms.

Gaining pedestrian access to service the residential accommodation is provided from Hill Street at two different points of the building. One is to access the upper floor apartments and the other offers direct access to the 1 no ground floor apartment.

The proposed bicycle storage areas are situated on the ground floor level directly onto the rear access lane. Access to the plant room and rear of No 133 Commercial Street shall be provided via a secure access controlled electric swing gate straight from the rear access lane.

5.2.4 Amount / Density

The development will provide approximately:-

- 22 Residential Apartments
- 3 Commercial ground floor units
- 10 No. cycle spaces (1 stand per 5 bedrooms)
- Commercial refuse storage
- Residential refuse storage

The proposal represents a medium density mixed use development which conforms to that of the surrounding mix of residential and commercial uses associated with the local centre. The reduction of the residential units from 29 to 22 is in response to the pre-application advice.

With the above in mind, the new proposed number of 22 apartments is compatible with the surrounding local area and urban grain and thus would not have a negative impact on the surrounding environment.

5.0 Design & Access

5.3 Access and Movement to, from and within the development

This being a new development within the St Woolos area, the emphasis is based on safe, accessible movement of people and goods along routes that are both attractive and appropriate to the environment through which they pass.

Consideration has been given to all forms of movement and existing travel routes from the outset of the design process.

The proposals allows for full and inclusive access to all proposed facilities. These include the entrance, circulation areas and accommodation units which all follow the guidance noted below:

- Planning Policy Wales (Edition 10, December 2018)
- Approved Documents Part M (2015) and Part B (2010) of the Building Regulations
- Equality Act 2010
- Technical Advice Note 12 – Access, Movement, Character, Environmental Sustainability and Community safety

The design proposals have also been developed in accordance to produce a layout that satisfies practical requirements such as access for emergency vehicles, whilst including clear connections and ease of access for deliveries to the site. The proposed layout has also been developed with cyclists and pedestrian access in mind.

Vertical circulation throughout the proposed development includes for fully equipped lift facilities to maximise the opportunity for independent use by people with mobility impairment.

All entrances are to be clearly indicated and visible as well as being fully accessible from well lit surrounding footpaths to ensure safe access is provided throughout. Incorporating level disabled access for both residential and commercial aspects of the development.

5.3.1 Servicing & Emergency Vehicles

The scheme can be serviced by a variety of emergency vehicle types from both Hill Street and Commercial Street.

5.3.2 Building Cleaning / Maintenance

Provision of building cleaning equipment and safe access to the roof will be carefully managed by the Buildings Management programme.

5.3.3 Pedestrian and Cycle Movement

Pedestrian access for the building users, visitors and postal deliveries can be made via various points for both the residential and existing retail fragments of the development. Access points are to be directly made from Hill Street or Commercial Street. All entrance points in to the proposed development will offer a level approach from access pavements, incorporating external lighting and illumination with appropriate levels and contrast in light.

Powered and / or management controlled assisted entrance policies will be adopted with level, non-slip floor finishes that have been specified to maximise inclusion. Safe pedestrian access has been designed in accordance with EA accessible guidelines (2010).

5.3.4 Cycle Storage

The cycle stores have been designed to provide safe, secure and undercover cycle accommodation in line with the CSS Wales Standards (2008).

5.0 Design & Access

5.4 Community Safety

TAN 12 states two objectives that should be met to achieve community safety within a design proposal, these are as follows:-

- 'Ensure attractive, safe public spaces'
- 'Security through natural surveillance'

It is considered that a high level of community safety currently exists at the site. An example of the existing site safety is the site's location, it is located on a main busy high street within the city centre which provides good clear natural surveillance from both Commercial Street and Hill Street.

5.4.1 Secured by Design

This development aims to adhere to ideas set out by Secured By Design (SBD).

Secured by Design is the official UK Police flagship initiative supporting the principles of designing out crime and has aimed to encourage the construction industry to consider crime prevention at design stages rather than using add on crime prevention methods post construction.

The initiative aims to assist in reducing the opportunity for crime and the fear of crime by creating a safer and secured environment for the buildings users.

5.4.2 Waste Storage Requirements

Waste requirements for the proposed development have been determined within the pre-application response received from Newport City Council Planning Department and by using the Draft Waste Storage and Collection Supplementary Planning Guidance - April 2019.

Internal storage capacity:

Consideration will be given to provide sufficient space in the kitchen and existing retail areas for the for the storage of recyclables, compostable and general refuse.

External storage capacity:

In order to accommodate the required bin storage according to the SPG we have incorporated a dedicated secure external bin store for the residential units. The residential bin store is to be situated to the rear of the building (Western Boundary) on the Ground Floor. Additionally, all bin store locations are accessible for pedestrian access to allow the movement of bins to be collected via Newport Road. A system for both bin stores are to be managed by the future building management team.

By providing recycling facilities throughout the development it will encourage the buildings occupants to dispose of their refuse responsibly and to recycle as much of their waste as possible.

5.0 Design & Access

5.5 Environmental Sustainability

The proposed mixed use development will aim to meet or improve upon all current regulation standards and aims to utilise enhanced insulation to the external fabric to reduce the U-Value calculations and use of natural ventilation when possible.

Creating a “Sustainable Development” requires a process of design that strives towards creating an equilibrium between the needs of mankind and the capacity of the world which we inhabit.

The following are examples of design decisions indicating how we aim to achieve this:

- Finding a balance between the reduction of solar gain and the promotion natural daylight and encouraging the flow of natural light through the building

The following national and local guidance Environmental policies have also been considered:

- Planning Policy Wales (Edition 10 December 2018)
- Technical Advice Note (TAN) 12 - Design (2016)

5.5.1 Effective Land Use

After reviewing the history of the previous planning applications, it can be seen that this new full planning application is the first of it's kind for the new larger site boundary. The proposal seeks to provide the most efficient land use possible by:

- Responding sensitively to scale, form and massing of the existing area
- Capitalize on the location of the site as it is close to existing commercial activity
- Make the most of the internal building structure space where possible
- Make best use of the number of storeys where appropriate

The proposed development comprises the beneficial reuse of an brownfield site to create a new mixed use development at a highly sustainable and accessible location.

5.5.2 Sustainable Materials

Where possible the use of materials with a low environmental impact (embodied energy), reduced energy inputs, sourced sustainable (i.e. Forestry Stewardship Council timber), locally sourced to reduce transportation and carbon footprint.

5.5.3 Efficient Use of Energy

The development aims to achieve an initial reduction in energy demand through improvement of U - values and air tightness standards above current Part L Regulations:

There is potential for:-

- Energy efficient lighting and appliances are to be used throughout
- Centralised & Solar hot water heating is to be reviewed Low energy
- Mechanical ventilation systems with high levels of heat recovery
- The potential for Photovoltaic panels fitted to the roof will generate and provide electricity to the building TBC

5.5.4 Passive principles

Aim to minimise solar gain, whilst maximising natural daylight.

5.5.5 Health and Well-being

Adequate day-lighting and views out will be provided in all the relevant functional areas.

Glazing types that find a balance between the reduction of solar gain and the promotion of natural daylight will be introduced as necessary.

5.5.6 Noise Control

A full noise and vibration assessment has been carried out and design recommendations have been made. REF: Acoustic and Noise Ltd - Environmental Acoustic Assessment Report.

5.0 Design & Access

5.5.7 Environmental Sustainability

The following factors have been investigated:

- Building construction and detailing
- Building materials
- The required internal conditions, lighting, heating, appliances etc...
- Weather data based on the buildings location
- Heating demand
- Domestic hot water demand
- Electricity demand (auxiliary & Lighting)
- Ground source heat pumps
- Electricity demand (auxiliary & Lighting)

The site master plan represents the best current practice in sustainable high density urban planning where the development should make the best use of available space.

All sustainable design solutions will be examined for the proposed development in order to meet the expected sustainability standards.

All sustainable design solutions will be examined for the various phases of the development in order to meet the expected sustainability standards.

The scheme has made, and will make use of the best passive principles currently available in an effort to reduce both construction and running/operational costs. These approaches extend from the general layout of the proposal, to the amount of glazing, orientation and noise reduction in individual rooms.

The proposal makes the best use of pedestrian and car movement within the site and wider links to the public transport system.

During the feasibility study stage of the project, many renewable energy methods were investigated for inclusion within the development. Given the implementation of the revised Part L of the Approved Documents, it is highly likely that some of these energy production methods will be incorporated in the detailed proposals.

Various heating systems are being investigated including electric heating systems.

Low embodied energy materials will be used during the construction phase. Where possible, materials used for construction will be sourced locally from responsible sustainable sources. The buildings will aim to achieve reductions in energy demand through the use of improved building fabric, raising both energy efficiency and air tightness.

Adequate daylighting and views have been key design drivers in an effort to ensure the health and well-being of building occupants.

Building users will be encouraged to recycle carefully, and all construction operations will follow the current best practice guidelines.

PROPOSED SCHEDULE OF ACCOMMODATION

GROUND FLOOR

Existing 3 No Retail / Commercial Units

No 133	115m ² / 1238 ft ²	NIA
No 134	53m ² / 570 ft ²	NIA
No 135	90m ² / 970 ft ²	NIA

TOTAL 258m² (2777 ft²)

RESIDENTIAL UNITS

Ground Floor -	2 No Units
1st Floor -	8 No Units
2nd Floor -	6 No Units
3rd Floor -	3 No Units
4th Floor -	3 No Units
5th Floor -	Roof Amenity / Garden Area

TOTAL 22 UNITS

CYCLE PARKING

10 No Cycle spaces for Residential

7.0 Appraisal and Conclusion

Through this Design and Access Statement we have aimed to illustrate that the proposed development is of high merit and will be a significant asset to the evolution of the St Wollos area and the City of Newport's residents, offering quality City Centre housing.

From current market research we have been made aware there is a substantial requirement for additional homes in the area. Therefore, the proposal put forward is for 22 residential apartments with three existing retail / commercial units at ground floor level.

This is a great location with countless commercial opportunities, thus improving the vibrancy of the existing busy shopping centre.

The site is an existing vacant building that up until recently had commercial uses evident, both of which in need of rejuvenation. Therefore it has been considered for this mixed use redevelopment.

It has been demonstrated throughout the pre-application collaboration that the proposed development presented is in accordance with the current policies relevant to the type of development being put forward.

Access and movement to, from and throughout the site has been greatly simplified on comparison to the existing layouts. This has been achieved by combining the 2 existing sites and simplifying the layout, thus providing good access points for both commercial and residential uses.

On the basis of our Statement, we conclude that the design proposal will deliver a number of benefits and will assist in meeting a number of key objectives of national and local planning policy:

As the existing site uses do not currently fulfil its potential in such a vibrant and prominent location, we feel this proposed development will offer Newport the opportunity to sympathetically improve an existing key city centre site by extending the already energetic community that is present, as well as providing central, affordable and sustainable residential accommodation for the local community.

8.0 Perspective Views



CGI Perspective PL - 1000

View from North

133 - 135 Commercial Street, Newport.

8.0 Perspective Views



CGI Perspective PL - 1001

View from West

133 - 135 Commercial Street, Newport.