
Planning Statement

Local Centre Site
Jubilee Park
Rogerstone

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Planning Statement

Local Centre Site, Jubilee Park, Rogerstone



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1. Introduction

- 1.1. Savills is instructed by Walters Land (Rogerstone) Ltd (“Walters”) to submit an application to Newport City Council (“NCC”) for outline planning permission (with all matters except access reserved) for residential development on two parcels of land within Jubilee Park in Rogerstone.

Background

- 1.2. Walters Land (Rogerstone) Ltd is a subsidiary of the Walters Group. The Walters Group is a family run South Wales based company which specialises in civil engineering, development and plant hire and sales.
- 1.3. Walters Land (Rogerstone) Ltd, secured outline planning permission for the redevelopment of the former Novelis/Alcan factory site to deliver a new neighbourhood known as Jubilee Park. The outline permission allows for up to 1,200 new homes, together with a new school, a network of hard and soft open spaces and a small local centre which could accommodate a mixture of uses including shops, a clinic or surgery, pharmacy, restaurant, pub, and hotel.
- 1.4. Since outline planning permission began significant progress has been made: the site has been remediated and transformed, with most of the housing, new infrastructure, landscaping and open space completed and the new school is also open. However there has been little interest from potential retailers or leisure operators - despite Savills having marketed the opportunity since 2016, and the health board has confirmed that it does not wish to operate a clinic, surgery or pharmacy within Jubilee Park.
- 1.5. In light of the lack of interest in the delivery of the local centre, in 2019, Walters secured planning permission for the development of the new retail provision approved at Jubilee Park on the Former Criddle Garage site on the northern side of Tregwilym Road.

Application Proposals

- 1.6. With part of the local centre delivered at the nearby Former Criddle Garage site and not within Jubilee Park, Walters has considered an alternative approach to the two vacant parcels and is looking to release the land to deliver additional housing. Barratt Homes, Bellway Homes, and Taylor Wimpey have already built new homes at the site is clearly a deliverable one too.
- 1.7. In this context, planning permission is sought for the residential development of the site. The application is submitted in outline form with all matters reserved save for access. The description of development is as follows:

“Outline application (with all matters reserved save for access) for residential development”

- 1.8. A masterplan has been prepared for the two parcels of the site which, is informed by the approach taken for other parcels within Jubilee Park, and shows how they could be developed.

Statement Structure and Application Documents

- 1.9. This Statement is structured as follows:

Section 2: Sets out the background to the Jubilee Park site and the marketing of the local centre site that has taken place;

Section 3: Describes the proposed development and associated pre-application discussions;

Section 4: Presents the key messages from local and national planning policy;

Section 5: Assesses the proposals against the local and national planning policy context; and

Section 6: Provides a series of closing remarks about the acceptability of the proposals.

- 1.10. A lot is obviously known about the site by Walters who secured the original outline planning permission for its redevelopment and then acted as master developer to remediate the whole site, construct the school, and provide the infrastructure and open spaces. This outline application builds on that experience and is accompanied by a host of technical documentation which includes the following:

- Design and Access Statement (prepared by Hammonds Ltd);
- Pre-Application Consultation Report (prepared by Savills);
- Transport Assessment (prepared by Arup);
- Noise Assessment Addendum (prepared by Arup);
- Flood Note (prepared by Arup);
- Drainage Strategy (prepared by Arup);
- Ecological Appraisal (prepared by EDP); and
- Geotechnical and Geo-Environmental Assessment (prepared by Integral Geotechnique IG).

2. Background, Context, and Marketing

- 2.1. This section of the Statement provides the background to the proposals and the planning context at Jubilee Park.

Jubilee Park Planning Permission

- 2.2. Following the closure of the former Novelis / Alcan aluminium factory in April 2009, Savills on behalf of Walters Land (Rogerstone) Ltd submitted an application for outline planning permission for the redevelopment of the site to deliver a new neighbourhood which has become known as Jubilee Park (ref. 12/0886). The decision notice is included at **Appendix 1**.
- 2.3. The description of the development permitted is as follows:

“Comprehensive redevelopment of former aluminium factory complex to create a new Neighbourhood containing:- a range of new homes including houses, apartments and some sheltered accommodation for the elderly (C2 and C3), - a new primary school (D1), - a local centre including shops (A1), space for offices (B1), community facilities (D1), a Clinic or surgery (D1), pharmacy (A1) and health and leisure facilities (D2), - a restaurant and pub (A3) together with a lodge or hotel (C1), - a network of open spaces including parkland, footpaths, sports pitches and areas for informal recreation, - new roads, parking areas, accesses and paths, - other ancillary uses and activities, - and requiring site clearance treatment and preparation, the installation or improvement of services and infrastructure, the improvement of flood defences and the creation of new water bodies and drainage channels, improvements/works to the highway network and other ancillary works and activities.”

- 2.4. The application was assessed in the context of the Newport City Council Unitary Development Plan (UDP) which was adopted in 2006 and covered the period from 1996 to 2011. At the time of preparation and adoption of the UDP the site was still used for the manufacturing of aluminium and the site was designated as white land within Rogerstone's settlement boundary. In the determination of the application weight was therefore given to the contribution that the proposals would make to the supply of housing on a site where the prospects of future use for employment purposes were remote.
- 2.5. Outline planning permission for the development was granted in August 2013 for the development. The permission allows for upto 1,200 new homes, together with a new school, a network of hard and soft open spaces and a small local centre which could accommodate a mixture of uses including shops, a clinic or surgery, pharmacy, restaurant, pub, and hotel.
- 2.6. The development is largely complete with the primary school operational and the housing constructed (or under construction) by Barratt Homes, Bellway Homes, and Taylor Wimpey. A new network of green spaces and infrastructure has also been created

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- 2.7. The outline application was assessed on the basis of a series of parameters in Outline Masterplan ref. G1280-4.1 rev.D and Design and Access Statement rev.C. Condition 4 required the submission of a site wide masterplan in accordance with the approved illustrative masterplan and Design and Access Statement that picked up on a series of identified design principles and considerations. These are included as Appendix 2.
- 2.8. Condition 4 of the outline permission was discharged by Walters under reference 13/0900. The masterplan that was approved through the discharge of Condition 4 is repeated below and included as Appendix 3.



Jubilee Park Masterplan

- 2.9. The masterplan shows that the site was to accommodate a range of different types of housing across a series of different development parcels. A comprehensive package of public open space was also shown including formal and informal space for play, a linear park, and a central park for the development. A secondary school was to be located in the south of the site with over 55s residential accommodation immediately south of the main vehicular access into the site from Tregwilym Road.
- 2.10. The masterplan shows that the local centre element would be split across two parcels of land either side of the new and improved vehicular access into Jubilee Park from the roundabout with Tregwilym Road. The parcel on the eastern side of the vehicular access would accommodate the retail and medical element of the local centre with the public house and restaurant on the western side of the vehicular access.
- 2.11. Alongside the masterplan itself, a Site Wide Masterplanning Document (also included as Appendix 3) was prepared to discharge Condition 4 of the outline planning permission. The Document set out broad principles for the development as a whole, as well as providing more specific requirements for key components of the site, including the "Site Gateway" which the two current application site parcels are a part of.
- 2.12. The Masterplanning Document identifies that the Site Gateway should:
- Provide a sense of arrival to vehicular and pedestrian users;
 - Landscape the boundary edges of the Local Centre adjacent to the main carriageway with structure planting;
 - Provide improved opportunities for crossing;
 - Construct a feature natural stone low wall reusing existing materials providing a distinctive gateway character;
 - Reinforce the sense of arrival with ornamental shrub and tree planting to 'frame' this main entrance into the site; and
 - Retain low level planting to southern of roundabout to maximise views of the amenity areas.

Marketing of the Local Centre Site

- 2.13. Savills has actively marketed the local centre element of Jubilee Park for nearly five years. Savills was instructed by Walters in October 2016 to establish occupier interest in the Local Centre element of the Jubilee Park development as well as that for the pub/restaurant/hotel element. Neither the Local Centre or the pub / restaurant area had been built and so its size, layout, and range of uses were to be defined and determined through the marketing process and occupier demand, providing the most flexibility for potential occupiers.

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- 2.14. Savills has extensive experience marketing retail, leisure, and food and drink premises across the UK and South Wales. From this understanding, it was clear that a successful scheme required a convenience store anchor.
- 2.15. There are obviously a limited number of convenience store operators and therefore targeted and tailored approaches were made to all of those which were active (or potentially active) in South Wales. Savills also specifically targeted the main supermarket operators with known requirements who would consider this location including Aldi, Lidl and Sainsbury's. Likewise, national pub operators who might consider this location, and could act as anchor tenants, were approached.
- 2.16. As well as producing standard marketing material as part of the initial marketing campaign, adverts were placed on the EG Property Link and Savills websites to try and reach the national market including occupiers and agents.
- 2.17. The feedback received during the marketing phase was that the anticipated immediate population of the residential development would not be enough to support a convenience store. The marketing process revealed that occupiers believe the local centre site within Jubilee Park does not provide the profile or accessibility required to the more established areas of Rogerstone. It is not visible from the nearby main road network, is screened from Tregwilym Road by Mandrake House, and is lower in height than Tregwilym Road.
- 2.18. In the time that the Jubilee Park site was marketed by Savills, no offers were received from any prospective retailers or developers for the local centre land that formed part of Jubilee Park.
- 2.19. Marketing efforts for the public house element had a similar outcome. Savills targeted public house and restaurant operators known to have requirements in this area which did not result in any interest.
- 2.20. Alongside the marketing of the site, Walters has approached the Aneurin Bevan Health Board (and specifically David Powell within the Primary Care and Community Division) to understand whether they wish to deliver a medical facility within Jubilee Park.
- 2.21. As a result of this exercise it has been established that, because of the site's proximity to a number of existing Health Board facilities, the development of a medical centre as part of the Jubilee Park development would not be feasible and is not something that the Board wishes to pursue. .
- 2.22. Instead, the Health Board suggested that the most suitable form of healthcare facility for the site would be a modest space for a district nurse.
- 2.23. Walters is presently the freehold owner of a building known as the "Drill Hall" which is located on the southern side of Tregwilym Road. It sits within the red line boundary for the original outline planning permission. The ownership of the Drill Hall is soon to be transferred to Rogerstone Community Council.

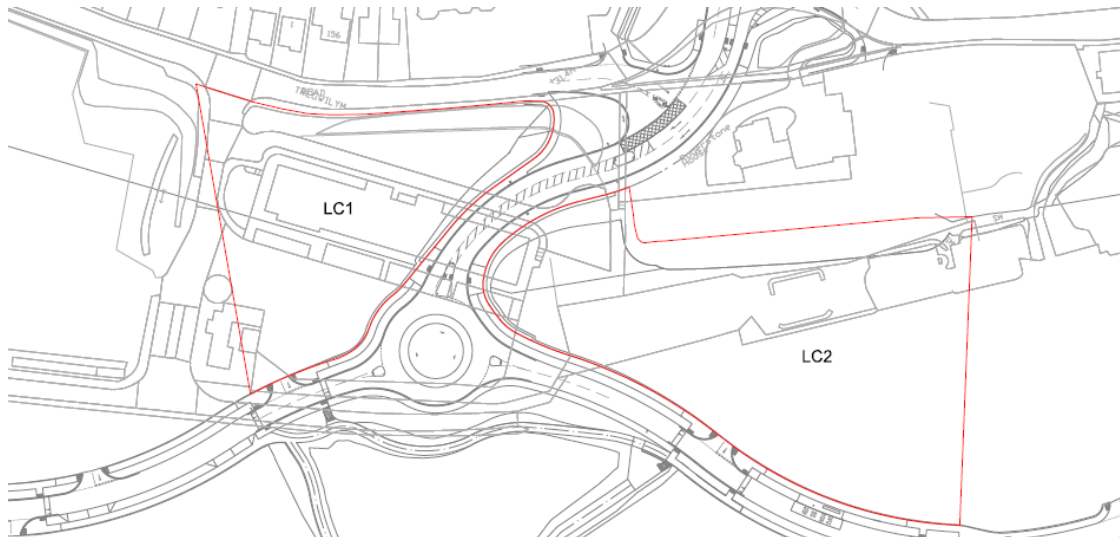
- 2.24. The building currently serves as the primary facility for the Alcan Indoor Bowls Club and Rogerstone Community Council but contains a series of unused rooms which would be suitable for use as a district nurses office.

The Former Criddle Garage Site

- 2.25. In marketing the local centre site envisaged in the LDP and the masterplan, occupier demand became apparent for the former Criddle Garage site on the northern side of Tregwylm Road which is also under the ownership of Walters.
- 2.26. This reflects the Garage site's position and profile which is highly accessible to Jubilee Park and other parts of Rogerstone but will also attract passing trade from Tregwylm Road and the nearby industrial estate.
- 2.27. Feedback from other prospective tenants for the smaller two units proposed has been similar, the prominence of the roadside (former garage) location is a deciding factor in progressing discussions on the leases, which is ongoing.
- 2.28. Informed by the respective levels of occupier interest, Walters secured planning permission for the development of the retail element of the local centre site at the former Criddle Garage site (ref.19/1270). The decision notice is included as Appendix 4.
- 2.29. This floorspace will act as the local centre for Jubilee Park (with no retail floorspace provided within the development itself) whilst also having sufficient visibility from the surrounding network to be attractive to occupiers. The proximity of the Former Criddle Garage Site to Jubilee Park was recognised throughout the determination process of the application.
- 2.30. As part of the permission, a Deed of Variation was put in place preventing the delivery of any more than the balance of Class A1 floorspace element set out in condition 48 of the outline planning permission for Jubilee Park. This limits retail space in the proposed local centre to a maximum of 1,000 square metres. With 640sqm allowed on the garage site, this leaves just 360sqm available for Jubilee Park and makes it highly unlikely that any retail provision will be provided there.

The Local Centre Site

- 2.31. With the retail element delivered at the Former Criddle Garage Site – and with no interest in the other uses - the land identified for the local centre within the main Jubilee Park site (as shown in the masterplan approved to discharge Condition 4 of the outline) is now available for redevelopment.
- 2.32. The Local Centre site comprises of two irregularly shaped parcels within Jubilee Park located either side of the main entrance into development from Tregwylm Road. The parcel on the western side of the entrance into the site is known as Parcel LC1 and the parcel on the southern side of the entrance into the site is known as Parcel LC2. These are shown in the extract below:



Site Location Plan

- 2.33. Parcel LC1 is bounded to the north by Tregwilym Road (with residential properties on its northern side), recently completed homes at Obama Grove to the west, by Jubilee Way (the main vehicular entrance into Jubilee Park from Tregwilym Road) to the east, and by the Central Park to the south on the southern side of Jubilee Way. Planted trees form the southern boundary of Parcel LC1 with Jubilee Way whilst a foul sewer runs along the western boundary of the parcel.
- 2.34. Parcel LC2 is bounded to the north by Mandrake House (a large four storey building providing over 55s accommodation that is positioned at a higher elevation), the remains of Tregwilym Castle to the northeast, residential development (including a three storey apartment block to the east), Castle Way to the south with residential properties to the south, and to the west by Jubilee Way and the Central Park. Planted trees form the southern, western, and northern boundaries of the LC2 Parcel.
- 2.35. The parcels comprise of made ground (and previously developed land) and were used as construction compounds in association with the delivery of other development parcels within Jubilee Park. Both parcels of land are fully remediated and are free from constraints:
- They are not subject to any local or national ecological or landscape designations;
 - They lie within Flood Zone C1 (which is served by significant infrastructure, including flood defences);
 - They do not contain listed buildings, conservation areas or Scheduled Ancient Monuments either onsite or close to the site's boundaries; and
 - They are flat (or relatively level) and easily accessible.

3. Proposed Development

Background

- 3.1. The delivery of the local centre element of Jubilee Park offsite at the former Criddle Garage site and the lack of need by the Aneurin Bevan Health Board for a purpose built facility has prompted Walters to consider how the portion of Jubilee Park originally envisaged for the local centre could be most appropriately utilised.
- 3.2. The two local centre parcels are located within Jubilee Park and are bound on three sides by either recently constructed housing or the surrounding road network. Given the nature of surrounding land uses and as Jubilee Park is clearly – and already - an excellent place to live the most suitable and deliverable land use is new housing. This would also help to meet the recognised demand and need for new homes in a sustainable location and make the best and most effective use of a small but important area of previously developed land.

Pre-Application Discussions

- 3.3. Savills entered pre-application discussions with NCC with regards to the site in October 2020 with a formal pre-application response received on 14th December 2020.
- 3.4. Initially the pre-application request suggested that the proposals could be delivered through either a non-material amendment under Section 96A or a minor material amendment under Section 73 of the Town and Country Planning Act 1990. The purpose of these applications would have been to vary the approved masterplan to show Parcels LC1 and LC2 as housing rather than as a local centre.
- 3.5. Feedback from NCC preferred a fresh application for either outline or full planning permission across both sites. The Council also advised that:
 - The key test for the application would be to demonstrate that the local centre could no longer realistically be developed on the Jubilee Park site.
 - Helpful discussion with regards to planning obligations and supporting documentation required;
 - Any layout plan should be sensitively designed, respond to the existing levels on site, create an attractive entranceway into the site, and either incorporate green spaces or be well related to existing nearby green spaces;
 - An updated Flood Consequences Assessment would be required. There would also be a requirement for SAB approval, unlike for the original outline permission;
 - An updated Ecological impact Assessment would be required at application stage. The requirement to demonstrate a biodiversity net gain has been introduced since the outline planning permission and measures to achieve this will need to be incorporated into the scheme;

- An updated Transport Assessment or Transport Statement would be required, the scope of which should be agreed with NCC. The pre-application response also provides advice with regards to parking standards.

3.6. The full pre-application response received from NCC is included as Appendix 5.

Proposed Development

3.7. With the above in mind, planning permission is sought for the residential development of the local centre site. The application is submitted in outline form with all matters reserved save for access. Accordingly, the description of development is as follows:

“Outline application (with all matters reserved save for access) for residential development”

- 3.8. Access will be obtained from Jubilee Way (the main vehicular access into Jubilee Park) and Castle Way via existing access points that were constructed to facilitate use the two local centre parcels as construction compounds.
- 3.9. An Illustrative Masterplan has been prepared by Hammond Architectural Ltd to show how the site could be laid out. It shows the site accommodating approximately 40 or 50 homes, comprising of a mix of houses and apartments.
- 3.10. Submitted as part of this application is a comprehensive Design and Access Statement. The Design and Access Statement provides key contextual information with regards to the application site itself and Jubilee Park as a whole, outlines the core constraints and opportunities that have influenced the masterplanning approach, and explains how the proposals respond to the principles set out in the Outline Masterplan and Design and Access Statement that was secured by Condition 4 of the original outline planning permission.

4. Planning Policy

Preface

- 4.1. Included at Appendix 6 is a summary of the relevant national and local planning policy context for the site and the proposals. It identifies relevant planning and land use policies and assesses the performance of the proposed development against the identified policy framework.

Planning Policy Context

- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, the development plan comprises of the following two documents:

Future Wales: The National Plan 2040 - Welsh Government has formally adopted Future Wales: The National Plan 2040 (Future Wales). Future Wales outlines the Welsh Government's strategies for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, delivering growth in the right areas, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.

Newport City Council Local Development Plan (LDP) – This document was adopted in 2015 and covers the period between 2011 and 2026. The approach taken in the LDP is to encourage the regeneration of previously developed and derelict land with the focus of housing delivery on brownfield rather than greenfield sites.

- 4.3. Whilst not having development plan status, the provisions of Planning Policy Wales (PPW) are relevant too. PPW (Edition 11), which was adopted in February 2021, represents the latest change to PPW since it was first published in May 1996. It rewrites and restructured Edition 9 in the context of the Well-being of Future Generations (Wales) Act 2015. Technical Advice Notes (TANs) support PPW and add more detailed content on how a range of issues might affect the development potential of the site.

Key Policy Messages

- 4.4. The key planning policy messages are as follows:
- 4.5. Newport (and Rogerstone within it), is identified in the Future Wales: The National Plan 2040 under Policy 1 (Where Wales Will Grow) as being within the Cardiff, Newport and the Valleys National Growth Area. Policy 1 of Future Wales, states that Welsh Government supports the strengthening of Newport's strategic role for sustainable long-term growth and investment. The subtext expands upon this by specifically stating that strategic growth should be focussed in Newport itself to support brownfield regeneration.

- 4.6. Jubilee Park forms an allocation in the adopted LDP with Policy H1(54) allocating the site for 1,034 homes. This is a significant contribution to meeting the total housing requirement over the plan period of 10,350 homes that is set in Policy SP10 (House Building Requirement). Jubilee Park – and the application site - is included within Rogerstone’s settlement boundaries.
- 4.7. Under allocation CF13ii, Jubilee Park is also expected to accommodate a new primary school whilst Policy R8 makes provision for the delivery of a local centre within Jubilee Park. Policy CF12 (Protection of Existing Community Facilities) protects against the loss of community facilities unless certain tests can be satisfied.
- 4.8. A fundamental principle of policy at both national and local level is that development should be directed to those locations which are most sustainable and where there is reduced reliance on private transport. This is reflected in Paragraph 4.1 of Planning Policy Wales, Policy 12 (Regional Connectivity) of Future Wales: The National Plan 2040, and Policy SP1 (Sustainability) and Policy T4 (Parking) of the LDP. Alongside this, both national (Paragraphs 3.51, 3.52, and 3.53 of Planning Policy Wales) and local policy (Policy SP18 of the Local Development Plan) support the re-use of previously developed land before the release of greenfield land.
- 4.9. Placemaking is a major theme in PPW and Future Wales. It features throughout t PPW (and much of the document is structured around it), and is described in Policy 2 (Shaping Urban Growth and Regeneration – Strategic Placemaking) of Future Wales: The National Plan 2040. The concept of “placemaking” relates to a holistic approach to design with a focus on accessibility, housing mix, connectivity, urban design, density, permeability at street level, and green and blue infrastructure.
- 4.10. There is a similar requirement for proposals to meet technical and environmental tests as well. This is found in planning policy at all levels which makes it clear that proposals need to be acceptable when measured against a range of matters ranging from transport and flooding to, ecology, noise, ground conditions, and drainage.

5. Assessment

5.1. On the face of it, the site has excellent planning credentials: it is previously developed land in an accessible and sustainable location which can clearly accommodate and deliver new development and infrastructure. This points to strong support for the basic principle of redevelopment and a modest but important opportunity to recycle land for a new purpose. To establish whether the application is the best response to this opportunity a number of issues need to be addressed. These come from experience with the site, together with planning policy and feedback from the Council's planning officers. Most of the issue have already been referred to in earlier sections of this Statement and include:

- Proposed land uses;
- Transport;
- Ground Conditions;
- Flooding and Drainage;
- Ecology; and
- Noise.

5.2. Reflecting the site's extensive planning history (dating back to the original outline permission but also a series of subsequent reserved matters approvals and associated discharges of conditions) a lot is already known about the site and this is reflected in much of the supporting technical survey work which either looks to update that already previously submitted or applies site wide considerations specifically to the application site itself.

5.3. Each of the above considerations is explained in turn below.

Proposed Land Uses

5.4. The redevelopment of the former Novelis/Alcan factory site to deliver the Jubilee Park scheme is a key part of the LDP's strategy. The site is allocated for a new neighbourhood incorporating 1,064 homes (making a significant contribution to the LDP's housing requirement), a new primary school, and a local centre. The allocation was built around the outline planning permission which has already seen the successful transformation of the site. Over 930 new homes have been built, together with a new primary school and a network of green and play spaces

5.5. The outline planning permission also makes provision for a small new local centre and allows a range of uses that could form part of it. This reflected an aspiration at the time the application was prepared and also tracked through into planning policy – with the LDP's designation of a local centre as part of the Jubilee Park site.

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- 5.6. The designation covers the two land parcels (LC1 and LC2) that form part of this application and the Council has made it clear that it will need to need to pass the tests of Policy CF12. This policy states that for a loss of an existing community facility it must be demonstrated either that alternative provision can be made elsewhere or existing provision is surplus to requirements. Whilst there is no local centre on the site, the Council has applied this policy to the facilities proposed there (in the outline planning permission and the LDP's designation).
- 5.7. Whether this is right or not, the proposals clearly pass both of the tests contained in Policy CF12.
- 5.8. Section 2 of this Statements contains a summary of the efforts made to attract occupiers and facilities that would help to create the local centre on the site. These were carried out by Savills, as agents acting on behalf of Walters and took place over an extended time period. .
- 5.9. On the commercial elements of the centre, the marketing process revealed that for a local centre to succeed, it needed to be anchored by a small supermarket that would generate the footfall and dwell time to attract other complimentary occupiers. An extensive marketing exercise undertaken by Savills found that Jubilee Park on its own is not of a size to support a supermarket and that Parcels LC1 and LC2 lack the visibility to draw the passing trade or additional spend needed to supplement expenditure from residents of Jubilee Park. This has meant that there was and is no demand for a supermarket in this location. Alongside this, marketing the site for the pub/restaurants/hotel element, discovered very weak local and national demand (even before the Pandemic) and no unserved requirements were identified (and there has been no interest in the site).
- 5.10. In response to the marketing exercise, Walters secured planning permission and has delivered a retail facility at the site of the Former Criddle Garage site at Tregwilym Road. The main strength of this site is that it is highly visible from the surrounding road network such that it attracts passing trade, particularly from vehicles along Tregwilym Road. The size of the retail element permitted is considered proportionate to the residential development of Jubilee Park and is highly proximate and well connected to the Jubilee Park development.
- 5.11. In terms of the tests set out in Policy CF12, it is therefore considered that, with regards to the commercial element of the local centre, suitable and appropriate local provision has been made elsewhere, in this case in a location that continues to serve Jubilee Park. This is in fact expressly recognised in the planning permission at the Former Criddle Garage site which was permitted on the basis that it replaced the provision expected at Jubilee Park (and legally limits the amount of retail space that could be developed there now).
- 5.12. As stated above there is simply no demand at all in this area for a new hotel, pub or restaurant.
- 5.13. With regards to medical or health provision, Walters has been advised by the Aneurin Bevan Health Board that, due to the size of Jubilee Park and its proximity to a number existing healthcare facilities, there is no requirement for a new surgery or pharmacy on the site. This reflects direct questions put to key personnel at the Board (whose details were provided by the Council).

- 5.14. Those questions did find a potential requirement for a modest space for a district nurse, and if this is progressed a room can be made available within the building known as the “Drill Hall” which is located on the southern side of Tregwilym Road and within the extent of the red line boundary for the original outline planning permission.
- 5.15. On this basis and in terms of the tests set out in Policy CF12, it is clear that the Aneurin Bevan Health Board has concluded that, due to the site’s proximity to a number of existing facilities, the delivery of an additional facility would be surplus to requirements. There are no other providers that could develop a community based facility on the site.
- 5.16. With CF12 satisfied, the question on land use becomes which type of development or activity would make the best use of the site. The clear (and easy) answer is housing – which responds to context and potential as well as planning policy and will help to meet the clear, recognised and pressing requirement for more new homes.
- 5.17. This is very much a common sense point and reflects the fact that both Parcels LC1 and LC2 sit next to recently built housing, that the site comprises of previously developed land as defined in PPW, is located in a highly sustainable location, and is free from the typical constraints (relating to flooding, ecology, heritage, and landscape) that could preclude development as set out below.

Transport

- 5.18. A Transport Assessment has been prepared by Arup in support of this application. Arup provided transportation and highways input into the original outline application at Jubilee Park (and the proposal for the local centre at the Former Criddle Garage site) and therefore have a thorough understanding of the site and its context. The Transport Assessment has been prepared following scoping discussions with NCC Highways Department.
- 5.19. As a starting point, the Transport Assessment provides information with regards to the Site’s proximity to a range of existing facilities and services. This demonstrates that, as well as Jubilee Park Primary School and the facilities at the Former Criddle Garage site (both of which have been delivered as by Walters as part of the scheme or in connection with it), there are a range of education, retail, leisure, and employment facilities within Rogerstone itself within a reasonable walking distances. Bus stops are located at Tregwilym Road whilst Pye Corner Rail Station is 1.1km away, and provide regular to higher order settlements where there are more services and employment opportunities. Alongside this, the application site is well connected by footways, both within the Jubilee Park development and outside of it the national cycle network also passes just to the east of Jubilee Park.
- 5.20. With regards to traffic generation and understanding the effect of the proposals on the highways network, the approach taken in the Transport Assessment is to compare the scheme as permitted at outline stage with the current status of built development on the site incorporating the additional homes proposed as part of this application. This is a robust methodology given that the original outline application was accompanied by various technical documentation and was found to be acceptable on highways grounds.

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5.21. The basic position is summarised in the table below:

2013 Consented Proposals (Outline Permission)	Current Status Incorporating Proposal
Up to 1,200 residential units	982 residential units
Primary School	Primary School
Local centre including community/shopping facilities for up to 1,000m ²	Three retail stores with a combined gross floor area of 636m ² (Tregwilym Road)
Pub/Restaurant/Hotel	

5.22. Not only is the number of homes built on site at present (and incorporating the 50 homes proposed), considerably less than the 1,200 home limit that is controlled via condition in the outline decision notice, a smaller local centre element has been constructed, both due to the lower quantum of Class A1 floorspace but also because no pub, restaurant, or hotel will be delivered.

5.23. Reflecting this, the current scheme incorporating the additional development generates a lower number of trips (by 1,008 in and 1,047 out daily) than the scheme that was permitted at the outline stage (and was assessed in depth and found to be acceptable on highways grounds)..

This allows a clear conclusion to be reached that the proposals will not have a material impact on the local highway network and that the proposals comply with Policy 12 (Regional Connectivity) of Future Wales: The National Plan 2040, Policy GP4 (General Development Principles – Highways and Accessibility) of the LDP, and the aims of Section 4.1 of PPW.

Ground Conditions

5.24. A report on ground conditions by Integral Geotechnique has been submitted alongside this application. The report provides an overview of the various documents and reports relating to ground conditions that have been submitted to Newport City Council as part of the outline application, or in applications to discharge planning conditions, or for reserved matters approval. The documents previously submitted include a Site Investigation Report, Risk Assessment Report, Remediation Strategy, Soil and Groundwater Monitoring Methodology, and Report on Grid Sampling and Testing Results.

5.25. Like other parcels within Jubilee Park, the application site has been reclaimed and remediated with works comprising the breaking out of residual concrete, excavation of made ground, crushing of acceptable material for use and removing unsuitable material, and formation of levels.

5.26. The approach for other parcels of land within Jubilee Park has been that, in advance of development commencing, Condition 33 (which requires a Verification Report) attached to the outline planning permission has been discharged. If approved, this application would create a new outline planning permission and therefore, reflecting that Parcels LC1 and LC2 have not been developed yet, it is anticipated that the need to submit a Verification report will be controlled via a pre-commencement condition.

Flooding and Drainage

- 5.27. Following initial scoping discussions with Natural Resources Wales, a Flood Note has been prepared by Arup in support of this application. The outcome of those discussions was that, whilst the proposals were considered acceptable on flooding grounds at outline stage, the flooding situation should be reviewed and a technical note (rather than a full Flood Consequences Assessment) prepared to support the submission.
- 5.28. The conclusion in the Flood Note is that the application site remains flood free during a 1%+CC (1 in 100 year plus climate change) event and, whilst southern parts of LC1 and LC2 may flood during an extreme 0.1% (1 in 1000 year event), the flood depth is less than 600mm. In this light, the findings of the Flood Consequences Assessment considered at outline stage remain sound and the conclusion remains that residential development on the two plots adheres to the requirements of TAN15.
- 5.29. Alongside the Flood Note submitted as part of this application, a Drainage Strategy has been prepared by Arup. The drainage strategy permitted at outline stage was designed to accommodate development on plots LC1 and LC2, albeit commercial rather than residential land uses, and therefore foul and surface water spur connections run into these parcels of land and provide connections into the existing site wide drainage system.
- 5.30. With regards to foul drainage, the number of houses built to date on Jubilee Park (even incorporating the new housing now proposed) will be considerably less than the 1,200 assessed and permitted at outline stage. It is therefore considered that there is sufficient capacity in the drainage network formed and S104 agreement for flows generated from the proposed development.
- 5.31. Since the Jubilee Park site was developed, Schedule 3 of the Flood and Water Management Act has come into effect in Wales, requiring the proposed surface water drainage design to achieve SAB approval. It requires that surface water drainage systems are designed in accordance with the Welsh Government's 'Statutory Standards for Sustainable Drainage Systems'. There is a requirement for drainage systems for a specific site to be selected based on a hierarchy and for consideration of matters relating to biodiversity, maintenance, and amenity.
- 5.32. Due to the application site's location and reflecting the constraints that the site is subject to, neither the collection of surface water for re-use, infiltration into the ground, or direct discharge into a water body is possible (all of which are positioned higher in the drainage hierarchy). Instead, the proposal is to make use of the existing surface water drainage network within Jubilee Park which has been constructed within the highways adjacent to plots LC1 and LC2 and outfalls to the Ebbw River.
- 5.33. Within the site itself, it is envisaged that raised planted, bioretention features / raingardens, a dry retention pond, and permeable paving will be incorporated into scheme design at reserved matters stage. A combination of these features will have a positive impact on biodiversity and contribute to placemaking objectives.

- 5.34. Taken together, the conclusion is reached that the proposals comply with both Policy SP3 (Flood Risk) of the LDP and Policy 8 (Flooding) of Future Wales: The National Plan 2040, whilst the proposed drainage strategy complies with the requirements of Schedule 3 of the Flood and Water Management Act.

Ecology

- 5.35. Submitted as part of this application is an Ecological Appraisal prepared by EDP. EDP advised on ecology matters as part of the original outline planning application and have been involved in the masterplanning process for the application proposals.
- 5.36. The Ecological Appraisal provides a desk-top overview of the application site's relationship with designated sites before Extended as well as the conclusions of Phase 1 habitat survey and a detailed survey with respect to badgers.
- 5.37. The conclusions of this survey work has been that, whilst there is no "in-principle" ecological constraint to the development of Parcels LC1 and LC2, there are notable habitat features on or adjacent to the application site which have the potential to support protected species.
- 5.38. As a response to the potential habitat that will be lost (which the Appraisal considered to be of negligible value), the Ecological Appraisal recommends that the site is laid out in a way which incorporates green and blue infrastructure, includes the retention of existing trees and additional tree planting, and delivers additional planting. All of these recommendations have been incorporated into the masterplan.

Noise

- 5.39. A comprehensive scoping exercise was undertaken with Newport City Council in March 2021 by Arup with regards to the level of technical information required on noise matters. It has been agreed that a new Noise Impact Assessment was not required and that an addendum to the Noise and Vibration chapter of the outline Environmental Statement would be considered suitable to provide a comparison of the outline and proposed scheme on noise matters.
- 5.40. The overall conclusion reached in the Noise Assessment Addendum is that the proposed residential scheme will result in a betterment on noise grounds compared to the commercial land use envisaged at outline stage for Parcels LC1 and LC2. The reasons for this are threefold. Firstly, the construction program will be shorter meaning that plant noise will last for less time. Secondly, a residential end use will generate lower levels of vehicular movements than a commercial end use and trips are more likely to be clustered within traditional daytime hours. Thirdly, there will be no requirement for commercial level heating, cooling, and mechanical ventilation plant equipment.
- 5.41. Taken together, the Addendum concludes that the proposals are acceptable with regards to noise matters allowing for the conclusion to be reached that the proposals comply with Policy GP2 (General Development Principles - General Amenity) of the LDP in so far as it relates to noise.

6. Conclusion

- 6.1. This Planning Statement has been prepared by Walters Land (Rogerstone) Ltd in support of an application for outline planning permission for residential development on two parcels of land (known as Parcels LC1 and LC2) within the Jubilee Park new neighbourhood.
- 6.2. Jubilee Park forms a core component of NCC's LDP and has largely been delivered with a total of 932 homes completed by three housebuilders and the primary school operational. Parcels LC1 and LC2 are the last remaining development plots within Jubilee Park.
- 6.3. Originally envisaged to accommodate a local centre comprising of retail floorspace, a pub/restaurant/hotel, and a medical facility, marketing of the site and discussion with the Aneurin Bevan University Health Board, has demonstrated that there is no demand for the delivery of such facilities within Jubilee Park.
- 6.4. As an alternative, Walters has developed a retail facility at the Former Criddle Garage site on the northern side of Tregwilym Road (very close to the site) whilst space has been made available to accommodate a district nurse's office, the most likely requirement of the Aneurin Bevan University Health Board within Jubilee Park.
- 6.5. With that in mind, Walters is proposing to develop additional housing on Parcels LC1 and LC2. Housing is the most suitable use for the site for the following reasons:
- The development of the site will make a positive contribution to the supply of housing within Newport;
 - Both parcels are bound on at least one side by recently constructed housing;
 - The masterplanning approach responds to the key principles envisaged at outline stage and through the discharge of conditions relating to the site wide masterplanning approach;
 - A package of survey work is submitted as part of this application which demonstrates that the proposals are acceptable with regards to matters relating to flooding, drainage, ecology, transport, noise, and ground conditions.
- 6.6. On the basis of the above, it is concluded that the proposals align with policies contained within the LDP and that the development of housing on the site is acceptable from a technical perspective.