

# Report



## Cabinet Member for Sustainable Development and Cabinet Member for City Services

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### Part 1

Date: 23 January 202

**Subject** **Supplementary Planning Guidance to support the Adopted Local Development Plan**

**Purpose** To formally adopt 5 Supplementary Planning Guidance documents to support the LDP

**Author** Planning Policy Manager

**Ward** All Wards

**Summary** The Local Development Plan (LDP) was adopted by Council on 27 January 2015 and is the development plan for Newport. Draft Supplementary Planning Guidance (SPG) documents have been prepared to provide additional detail and guidance on policies in the LDP. Five SPGs have been through a six-week public consultation, four of which are updated versions of currently adopted SPG. Comments have been received and the Council has made a number of minor amendments. It is now proposed that the SPGs are formally adopted by the Council. The SPGs to adopt are:

- Waste Storage and Collection
- Planning Obligations (update to existing)
- House Extensions and Domestic Outbuildings (update to existing)
- New Dwellings (update to existing)
- Flat Conversions (update to existing)

**Proposal** **That Cabinet Members note the comments received and any proposed amendments the Council is seeking to make. The Cabinet Members agree for the SPGs to be formally adopted.**

**Action by** Head of Regeneration, Investment and Housing

**Timetable** Immediate

This report was prepared after consultation with:

- All Council Members
- Statutory Consultees
- Head of Finance – Chief Finance Officer
- Head of Law and Regulations – Monitoring Officer
- Head of People and Business Change
- Internal Council Departments
- Community Councils
- Neighbouring Authorities
- General Public

**Signed**

## Background

The Local Development Plan was adopted by Full Council on 27<sup>th</sup> January 2015 and is used for development management purposes and determining planning applications. The LDP will be accompanied by Supplementary Planning Guidance (SPG) covering topic areas and policies which require more detailed guidance. Four of the Draft SPGs are updated versions of current guidance and one SPG has been prepared to provide new guidance. All five documents were subject to a 6-week public consultation from 21 June 2019 to 2 August 2019.

Comments have been received and considered by officers. The tables noting all comments received and the Council's proposed responses are available to view in Appendix 1. A summary of the main proposed changes to the SPGs are below.

## Key Issues Raised and Councils proposed response

There were two key issues raised as part of the consultation process. The first is the objection of charging a monitoring fee for Section 106 legal agreements based on a percentage of the application fee or total contribution. This objection is raised on the basis that this does not reflect the work involved and that it is not in line with local government charging legislation. There is however support for negotiation of the fee where significant planning obligations are required. The recommendation is for the SPG to retain the proposed approach because this represents the significant amount of work involved in all schemes that require some type of planning obligation agreement. The process is considered fair and reasonable and there is a section in the document that allows negotiation where fees could be considered financially onerous and phased payments were necessary.

The second key issue is the objection to the introduction of minimum space standards for all new housing. The key issues raised by the house building industry is that this is considered to be the introduction of new planning policy and not supplementary planning guidance. In addition, current housing types would not be able to meet the proposed standards, particularly 2 bed homes, and this would detrimentally affect the total provision of houses, in particular for first time buyers and those persons on a lower income.

In consideration of the comments received, we do not believe these space standards are the introduction of new policy but rather clarification of the housing standards required by policy H2 of the LDP. Following careful consideration, there is also a recommendation to remove the proposed minimum house standards. This recommendation is on the basis that Welsh Government have recommended, through an affordable housing review, consideration of space standards for new homes at the national level. The introduction of space standards is strongly supported nonetheless; it is just considered that this type of requirement is best set at the national level. This will provide a consistent approach that will ensure all planning decisions take into account the same matters which is particularly important when considering the viability of schemes. There will clearly need to be a lot of work and collaboration nationally to set these figures and officers will engage proactively to ensure Newport plays a role in this important work.

## Summary of Proposed SPG Changes

Waste Storage and Collection SPG – No proposed changes

Planning Obligations SPG – A small amendment to the text to provide clarity.

House Extensions and Domestic Outbuildings SPG – Proposed amendment to make reference to the new requirements relating to Sustainable Drainage Systems and the new Approvals Process for developments.

New Dwellings SPG – The proposed amendments are:

- To remove the proposed minimum space standard for new houses; and
- To make reference to the new requirements relating to Sustainable Drainage Systems and the new Approvals Process for developments.

Flat Conversions SPG Flat Conversions SPG – Proposed amendment to make reference to the new requirements relating to Sustainable Drainage Systems and the new Approvals Process for developments.

## Financial Summary

There will be no cost associated with adoption. Following adoption, it might be desirable to print hard copies of the SPG as office copies, but this will be a modest fee. The majority of users will download the SPGs electronically from the Council website.

## Risks

<b>Risk</b>	<b>Impact of Risk if it occurs* (H/M/L)</b>	<b>Probability of risk occurring (H/M/L)</b>	<b>What is the Council doing or what has it done to avoid the risk or reduce its effect</b>	<b>Who is responsible for dealing with the risk?</b>
Clarity on the LDP policies is not provided and therefore potentially more open to interpretation and challenge.	M	L	The five SPGs will help to provide clarity and offer further guidance to certain areas and policies of the LDP.	Head of Development Services/Planning Policy Manager
Draft SPGs will carry less weight by Planning Inspectors in the determination of planning appeals.	H	L	The five SPGs have been through public consultation and are now ready for adoption.	Head of Development Services/Planning Policy Manager

## Links to Council Policies and Priorities

The Local Development Plan is one of the statutory plans the Council has to prepare. It determines Newport's land use policies to 2026. The SPGs will supplement and support the overarching principles set out in the LDP, adding more detail and clarification where required.

Newport City Council has a Corporate Plan that runs to 2022. Its primary objective is 'improving people's lives'. It has four commitments; Resilient Communities, Thriving Cities, Modernised Council; and Aspirational People. The SPGs will help deliver these commitments by ensuring development is undertaken in a sustainable manner and provide positive and attractive spaces to work, live and visit.

## Options Available and considered

1. Approve the five draft SPGs for adoption.
2. Make alternations to the draft SPGs and then approve for adoption.
3. Approve some of the SPGs, but not all.
4. Do not approve any of the SPGs for adoption.

## Preferred Option and Why

The preferred option is Option A. The documents have been subject to public consultation and comments have been considered and in some instances, amendments have been made to the documents. Adopted SPGs will assist the Council in determining planning applications.

## Comments of Chief Financial Officer

There will be no financial impact in the adoption of these sets of supplementary planning guidance, any associated costs will be minimal and met from existing budgets.

## **Comments of Monitoring Officer**

The proposed 5 SPG's provide more detailed practical and technical guidance regarding the application of the strategic land use policies contained in the LDP and should provide a consistent approach for the determination of future planning applications. The draft SPG's have been the subject of public consultation for a period of 6 weeks and the responses received are set out in the report. The Cabinet Members are required to have regard to those responses and consider whether to adopt the SPG's with or without amendment. Some minor amendments are recommended, where appropriate, to provide greater clarity and to respond to relevant comments received. In particular, space standards for new houses have been removed as this is more appropriately provided for in national standards and the SPG's have been updated to include the new Sustainable Drainage Systems Approval system. Subject to these minor changes, it is recommended that the Cabinet member formally adopts these 5 SPG's. The final SPG's will then be a material planning consideration in the determination of relevant applications and greater weight can be attached to them now that they have been subject to public consultation, prior to their adoption.

## **Comments of Head of People and Business Change**

As required, this report has fully considered the Well-being of Future Generations (Wales) Act 2015.

These SPGs support many of the Well-being Goals and the Council Well-being Objectives.

All aspects of the Act's sustainable development principle, "*looking to the long term*", "*involving people*", "*collaborating with others*", "*taking an integrated approach*" and "*prevention*" have been fully covered in the appropriate section of this report.

Finally, from an HR perspective, there are no staffing implications.

## **Comments of Cabinet Member**

The Cabinet Member for City Services has been briefed on the Waste Storage and Collection draft SPG and consultation comments (none received). The Cabinet Member for Regeneration and Housing has been briefed on all of the draft SPGs and the comments received.

## **Local issues**

The SPGs will affect all wards in Newport.

## **Scrutiny Committees**

The SPGs have not been through are Scrutiny Committees.

## **Equalities Impact Assessment and the Equalities Act 2010**

The LDP as a whole has been subjected to an Equalities Impact Assessment. The Appraisals are to be adopted as SPGs which supplement the LDP. It is not considered necessary to have separate EIAs for every SPG.

## **Children and Families (Wales) Measure**

No consultation has taken place specifically with children and young people. Children and young people were eligible to comment on the Appraisals during the formal 8-week consultation. The subject areas of the Appraisals are not considered to be particularly relevant to children and young people.

## **Wellbeing of Future Generations (Wales) Act 2015**

The Well-being and Future Generations (Wales) Act seeks to improve the social, economic environmental and cultural well-being of Wales. Public bodies should ensure that decisions take into account the impact they could have on people living in Wales, in the future. The five main considerations are:

Long term: This work aims to ensure that developments are designed in a truly sustainable manner. The five SPG documents provide details as to how to provide the standards and facilities to ensure sound decisions are made for developments to provide places that are functional and pleasant for the needs of current and future stakeholders.

- Prevention:** The understanding and subsequent initiation of the requirements of the documents will mean that the developer will have a positive impact and this should prevent inappropriate and poorly designed developments.
- Integration:** Setting out design standards and planning obligations in such a detailed manner will assist developers and other relevant stakeholders in understanding what the Council will require at the planning application stage and provide clarity and transparency to the approval process. The consultation process has allowed these standards and requirements to be challenged and amendments to be made where appropriate. The adherence to the guidance will help make developments more attractive to residents and the community. The adoption of these documents will help interested parties understand their role when proposing development within the authority area. The purpose of creating supplementary planning guidance is to provide details as to the application of Local Development Plan policies. The overarching principles of the LDP is for the provision of sustainable development in all its forms. Therefore, this work can be seen to go some way to meeting all seven of the well-being goals for Wales. In particular, the guidance documents will require developers to produce places that create and support cohesive communities in an equal and healthy manner through provisions such as adequate waste storage, adequate amenity space for new developments or the agreement to provide a local area of play.
- Collaboration:** These five guidance documents have been through 6-weeks of public consultation on the draft documents. This consultation process was publicised on the Council's website and emails sent to neighbouring authorities, statutory consultees, planning agents and community groups. The consultation has informed the final version and allows collaboration between those interested stakeholders.
- Involvement:** There was a meaningful response to the consultation process, with relevant parties engaging. The consultation has informed the final version of the documents.

The proposal is in line with the Council's well-being objectives published in March 2017. Specifically, these proposals contribute to the well-being objectives to promote economic growth and regeneration whilst protecting the environment.

### **Crime and Disorder Act 1998**

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the adoption of these documents.

### **Consultation**

Extensive public consultation has taken place and comments have been received from interested parties. Consultation has also taken place within the Council, particularly with Streetscene.

### **Background Papers**

- Waste Storage and Collection



Draft Waste SPG v9  
- 27\_03\_2019.docx

- Planning Obligations (update to existing)



Planning Obs SPG  
2019 Sep 2019.doc

- House Extensions and Domestic Outbuildings (update to existing)



Draft House  
Extensions and dom

- New Dwellings (update to existing)



New Dwellings -  
SPG (SEP 2019).docx

- Flat Conversions ((update to existing)



Flat Conversions -  
SPG (Sep 2019).docx

Dated: 15 January 2020

## APPENDIX 1 –

### COMMENTS RECEIVED ON THE SPGs AND THE COUNCIL'S PROPOSED RESPONSE

#### Appendix A

Planning Obligations, House Extensions, New Dwellings and Flat Conversions.		
Respondent	Comment	Council Response
Glamorgan Gwent Archaeological Trust	<p>The draft documents acknowledge the existing policies within both Welsh Government and local government relating to archaeology and the historic environment. The policies in place through the existing LDP are Objective 5; SP9, CE4, CE5 and CE6. These will be relevant in the draft SPGs relating to planning obligations, extensions and outbuildings, new dwellings and conversions.</p> <p>There are two aspects of archaeological and built heritage potential that may affect development of both new build and building conversions, are the importance and value of buried archaeological remains, and the nature of historic buildings. The origins of Newport as a current city primarily lie in the Roman, Medieval and post-Medieval periods, relating to maritime transport and trading, military and defensive aspects of settlement and industry and transport as well as religious and secular buildings. These have contributed to the form and layout of the city and its environs.</p> <p>Current legislation and policy is supported by the TAN24: The Historic Environment and a series of best practice guidance on managing change in the historic environment. Awareness of the archaeological and built heritage resource ensures identification of opportunities to mitigate impact prior to or during development, and also potential for enhancement and protection by design.</p> <p>Proposed changes affecting the historic environment can best be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause</p>	We welcome the comments made and note that no specific amendments to the documents are required.

	<p>risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p> <p>It is important to recognise that Planning Policy Wales refers to historic assets, including buried archaeological remains and built heritage, being preserved in situ as a priority, and preserved by record if preservation in situ cannot be achieved.</p> <p>All archaeological work, including that undertaken to assess change in which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the ClfA or by a MCIfA accredited member.</p>	
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### **New Dwellings, House Extensions and Domestic Outbuildings and Flat Conversion**

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
City Services (SAB)	<p>It would be ideal to include within the 'General Principles &amp; Considerations' section of the New Dwellings and also the House Extension and Domestic Outbuildings documents, as this will help raise awareness of the SuDS requirements.</p> <p>I would be seeking to add a paragraph mentioning the SuDS legislation, it's requirements for any development of 100m2 or greater and how to contact the SAB:</p> <p>The Flood and Water Management Act (FWMA) 2010 (Schedule 3) came into effect in Wales on 7<sup>th</sup> January 2019 and requires all new developments where the construction area is 100m2 or more to use Sustainable Drainage Systems (SuDS) to manage on-site surface water.</p> <p>These surface water drainage systems must be designed and built in accordance with mandatory Welsh Government national standards, published by Welsh Ministers. They</p>	<p>Text relating to the new legislative requirements for SuD will be added to the following SPGs:</p> <ul style="list-style-type: none"> <li>• New Dwellings</li> <li>• House Extensions and Domestic Outbuildings</li> <li>• Flat Conversions</li> </ul>



	<p>must be approved by the council's Sustainable Drainage Approving Body (SAB). The SAB will undertake the statutory function of ensuring that surface water drainage proposals meet with the mandatory national standards and will adopt and maintain SuDs in accordance with Section 17 of Schedule 3 of the FWMA 2010.</p> <p>For all qualifying developments, SAB approval must be sought in addition to planning approval. Construction will not be allowed to commence on site following the granting of planning consent until SAB approval has also been granted.</p> <p>The SAB offers a chargeable Pre-Application Advice service to discuss &amp; consider surface water drainage proposals in detail and we strongly recommend applicants consider this prior to making a Full Application.</p> <p>Information regarding SuDS, applying for SAB approval and the scale of charges can be found on the NCC website under Sustainable Drainage Systems. The SAB can also be contacted via email: <a href="mailto:sab@newport.gov.uk">sab@newport.gov.uk</a>.</p>	
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<b>Planning Obligations</b>		
<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Home Builders Federation	<p>Para. 5.2 Financial contributions – The HBF sees no need to include the wording ‘unless agreed in writing at the end of the sentence ...’ We can also see no justification for not returning the unspent 5%. The HBF request both of these are removed from the wording.]</p> <p>Para. 6.2 The HBF objects strongly to the suggestion that a monitoring fee should be charged on a percentage basis of either the fee or the S106 total contribution as this in no way reflects the work involved, either with the number of contributions or their complexity, i.e. a large development could have a single payment or a number of payments phased over a number of years with the same monitoring fee.</p>	<p>Agree: individual S106 agreements will determine the arrangement between the Council and Owners</p> <p>Disagree: The costs incurred in monitoring and administering planning obligations are an impact of a development, one that the Council would not have to bear if the development were not to take place. Monitoring of obligations will be undertaken by the Council to ensure all obligations entered into are complied with on the part of both the developer and the</p>

	<p>HBF's comments are based on the what we believe to be the relevant legislation which allows LPA's to charge for such a service which is the Local Government Act 2003 s.93 Power to charge for discretionary services.</p> <p>(1) Subject to the following provisions, a [F1relevant authority] may charge a person for providing a service to him if—</p> <p>(a) the authority is authorised, but not required, by an enactment to provide the service to him, and</p> <p>(b) he has agreed to its provision.</p> <p>(2) Subsection (1) does not apply if the authority—</p> <p>(a) has power apart from this section to charge for the provision of the service, or</p> <p>(b) is expressly prohibited from charging for the provision of the service.</p> <p>(3) The power under subsection (1) is subject to a duty to secure that, taking one financial year with another, the income from charges under that subsection does not exceed the costs of provision.</p> <p>Para. 6.3 The HBF supports this suggested approach based on the comments to para. 6.2. Such an approach could however be supported by a scale of fees based on officer's time and the number/type of S106 requirement. For instance, the requirement for a single payment generates very little work compared to ensuring some physical work has been completed requiring a number of site visits.</p>	<p>Council. Developers entering into planning obligations will be required to pay a monitoring contribution costs incurred in the administration, monitoring, and reporting of the discharge of the obligation. Work involved includes maintaining the database, logging individual obligations, checking triggers, ensuring indexed amounts are correct, arranging receipt of contributions, alerting service areas of receipts so that the required actions can be programmed, checking the completion of actions, making sure that records are kept of discharge of clauses, removing discharged obligations from the Local Land Charges Register etc. Generally, the level of monitoring correlates to the level of obligations. As such, in accord with the guidance outlined in the new CIL Regulations (dated 1<sup>st</sup> September 2019), the scale of fees are deemed to be fair and reasonable. Furthermore, a safeguard has been included to ensure that monitoring fees are not financially onerous; in those cases involving significant planning obligation contributions, the SPG recognises that it may be appropriate to negotiate a fee based on the amount of officer involvement, rather than the above formula. Additionally, phased payments related to occupancy rates will also be considered for significant contributions.</p> <p>Disagree: Children from the affordable homes will have</p>
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	<p>Para. 15.4 The HBF requests an explanation as to why this has been introduced. The residents of the affordable homes and their children will be free to use the open space provided on the site and also attend the local schools. Please also clarify does this mean that the affordable dwellings will be removed from the calculation of the actual S106 requirement, which are both based on the number of homes/ residents. If this change is retained then the reason for it and the point about calculation should be included in the text of the SPG.</p> <p>Para. 16.3 The notes the addition of an additional bullet point which states: ‘provision of any necessary interim school measures which, in some circumstances, might be required when it is not possible to ensure that permanent measures will be in place on time. ‘</p> <p>The HBF requests some additional supporting text to explain what is meant by interim ie. time scales. This also introduces the risk of double charging where one developer may get charged for example for a portacabin classroom which is seen as interim but then another developer a few years later gets charged for the permanent classroom at the same school. Supporting text should be added to cover this point.</p>	<p>access to all facilities. This policy merely states that when calculating leisure and education obligations, affordable dwellings are not included in the calculation. Only the open market dwellings form part of the calculation. This is a policy that recognises viability issues and aims to encourage the provision of affordable dwellings</p> <p>Disagree: The term ‘interim’ allows for a degree of flexibility for all parties and should be retained. The concern raised about portacabins is clarified by the last paragraph of 16.4 of the SPG, stating that pupil capacity will be calculated net of any capacity that has been achieved through using temporary accommodation for 3 years or less</p>
Redrow	<p>Redrow welcomes paragraph 6.3 whereby “In those cases involving significant planning obligation contributions, it may be appropriate to negotiate a fee based on the amount of officer involvement, rather than the above formula”. Any S106 administrative fee must only reflect the additional work undertaken by the necessary officer involvement. This matter has been set out in the judgement of Oxfordshire CC v SoS CLG case that found that the use of standardised fees or a percentage of contributions sought is not appropriate.</p>	<p>Disagree: The costs incurred in monitoring and administering planning obligations are an impact of a development, one that the Council would not have to bear if the development were not to take place. Monitoring of obligations will be undertaken by the Council to ensure all obligations entered into are complied with on the part of both the developer and the Council. Developers entering into planning obligations will be required to pay a monitoring</p>

		<p>contribution costs incurred in the administration, monitoring, and reporting of the discharge of the obligation. Work involved includes maintaining the database, logging individual obligations, checking triggers, ensuring indexed amounts are correct, arranging receipt of contributions, alerting service areas of receipts so that the required actions can be programmed, checking the completion of actions, making sure that records are kept of discharge of clauses, removing discharged obligations from the Local Land Charges Register etc. Generally, the level of monitoring correlates to the level of obligations. As such, in accord with the guidance outlined in the new CIL Regulations (dated 1<sup>st</sup> September 2019), the scale of fees are deemed to be fair and reasonable. Furthermore, a safeguard has been included to ensure that monitoring fees are not financially onerous; in those cases involving significant planning obligation contributions, the SPG recognises that it may be appropriate to negotiate a fee based on the amount of officer involvement, rather than the above formula. Additionally, phased payments related to occupancy rates will also be considered for significant contributions.</p>
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<b>New Dwellings</b>		
<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Home Builders Federation	Para. 5.5.2 The HBF object to the proposal to impose space standards on new dwellings. In terms of this being introduced in an SPG the HBF	The space standards for flats are not new content for this SPG. The original SPG sets out space standards in

	<p>considers that this is not compliant with the Welsh Government Guidance contained within the Local development plan-manual-edition-2 which states.</p> <p>7.2.2.2 Supplementary Planning Guidance (SPG) can be used to show in more detail how generic LDP policies will be interpreted although SPG should not include new policies (see sections 7.3) [7.31 The LDP contains policy; SPG contains guidance and advice only. All SPG should derive from a generic policy].</p> <p>The HBF considers that the adopted LDP does not contain a policy relating to dwelling space standards from which this new SPG requirement can derive, so its inclusion is contrary to WG guidance.</p> <p>The HBF are aware that the Welsh Government are currently considering space standards following the recent affordable housing review, although these initially would only apply to all affordable homes, WG have indicated a wish for all homes in Wales to meet a similar standard in the future. The HBF are happy to work with WG on these standards and as they relate to the physical building consider that Building Regulations would be the appropriate way in which to impose such standards. We would also push for a standard set of space standards across Wales to ensure consistency and avoid having up to 22 different standards.</p> <p>If the Council do not accept that these standards cannot be imposed through SPG as stated above, then the HBF asks if the Council could work with the industry to allow a greater range of sizes to cover differing types of dwellings/types i.e. terrace, semi, detached, bungalows, flats.</p> <p>The HBF would also note that by increasing houses sizes then the cost of houses is also likely to increase.</p>	<p>Table 5.1 and this draft has sought to clarify the difference between 'walk up' and 'communal access' space requirements to ensure the standards reflect both types of development. The space standards have been reduced to the lowest figure of either the standards set out in DWR or ACG.</p> <p>Housing space standards are a new addition to table 5.1. The introduction of these figures are not considered new policy but clarification of requirements of policy GP2 and H2 of the LDP. In addition, space standards are an established principle of the SPG.</p> <p>It is understood that the Welsh Government are currently considering space standards following the recent affordable housing review. It is considered that although the authority are very supportive of the use of minimum space standards in all types of housing it is considered appropriate for this to be set at the national standard.</p>
Redrow	<p>Paragraph 5.5.2 proposes "Desired requirements for gross internal floor space". Redrow does not welcome</p>	<p>The space standards for flats are not new content for this SPG. The original SPG</p>

	<p>minimum housing standards. A range and choice of housing is advocated by PPW. Minimum housing standards could adversely impact on abilities for first time buyers to utilise government initiatives such as Help to Buy. The introduction of minimum standards could see popular house types used by Redrow no longer being possible in Newport, house types increasing in price (due to size increase) not making them affordable to the equivalent buyers and reduce the number of affordable housing units being delivered on sites.</p> <p>1.3 Having reviewed Redrow's two product ranges currently being built Wales there are a number of house types that would not comply with the suggested minimum sizes. The two product ranges are the popular Heritage Collection and the Harwood Homes Collection. The Heritage range is currently being built at the former Tredegar Park Golf Course and Llanwern Village in Newport and was also built at Mon Bank Sidings.</p> <p>1.4 In relation to the Heritage Collection there are 8 house types (4no. in standard range and 4no. in LCHO range) that would be affected by the proposed minimum standards.</p> <p>1.5 In the standard range these house types are the Ledbury (2 bed mid terrace at 71sqm), the Malvern (3 bed end terrace at 84sqm), the Malvern 4 (4 bed end terrace at 95sqm) and the Shrewsbury (4 bed detached at 105sqm). This is not considered appropriate by Redrow who believes that the Heritage Collection and the smaller product offering provides a great choice of house types of a good size to meet buyers needs, especially first time buyers. These house types proved highly popular at the Mon Bank sidings development with a high proportion of them used.</p> <p>1.6 Within the LCHO range the house types are the Avon (2 bed mid terrace at 63sqm), the Tavy (2 bed mid terrace at 77sqm), Avon 3 (3 bed end terrace at 73sqm) and the Dart (3 bed</p>	<p>sets out space standards in Table 5.1 and this draft has sought to clarify the difference between 'walk up' and 'communal access' space requirements to ensure the standards reflect both types of development. The space standards have been reduced to the lowest figure of either the standards set out in DWR or ACG.</p> <p>Housing space standards are a new addition to table 5.1. The introduction of these figures are not considered new policy but clarification of requirements of policy GP2 and H2 of the LDP. In addition, space standards are an established principle of the SPG.</p> <p>It is understood that the Welsh Government are currently considering space standards following the recent affordable housing review. It is considered that although the authority are very supportive of the use of minimum space standards in all types of housing it is considered appropriate for this to be set at the national standard.</p>
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	<p>end terrace at 84sqm). Again, these are popular house types that have provided new homes for many first time buyers across South Wales under LCHO delivery.</p> <p>1.7 For the Harwood Homes Collection there are 6 house types that do not comply. Whilst not yet developed in Newport this house type range has been specifically designed to provide efficient layouts for first time buyers without comprising on overall quality standards. The first Harwood Homes development in Wales will be commencing next month in Caerphilly.</p> <p>1.8 The 6 house types that do not comply are the Hornbeam (2 bed mid terrace at 69sqm), Willow (3 bed mid terrace at 76sqm), Cherry (3 bed end terrace at 82sqm), Pine (3 bed semi-detached at 86sqm, Chestnut (4 bed detached at 101sqm) and Rowan (4 bed detached at 106sqm).</p> <p>1.9 The impact of these minimum standards on the Redrow house range used UK wide would be that no 2 bed offering would be available for use in Newport.</p> <p>1.10 Redrow would not welcome the introduction of minimum standards as it would likely impact the greatest those that are first time buyers and/or at the lower incomes. It could also result in a reduction of affordable housing units by virtue of the private units being greater in size and therefore less units in total being able to fit on sites.</p> <p>1.11 It is probably commonly known that of the house builders developing in Newport that Redrow's house types are likely to be larger and more generous in size than the others. The concerns expressed above to Redrow are likely to be further problematic to other house builders in Newport.</p>	
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