

Report



Cabinet Member for Sustainable Development

Part 1

Date: 7 October 2021

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

Purpose To formally adopt 3 Supplementary Planning Guidance documents to support the Local Development Plan

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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. Three draft SPGs have been through an eight-week public consultation, one is a new design guide the other two are updated versions of currently adopted SPG. Following consultation, comments have been received and it is recommended that a number of minor amendments are made and the SPGs are formally adopted. The SPGs recommended for adoption are:

- Shopfront Design SPG (New),
- Affordable Housing (amendment to existing SPG),
- Flat Conversions (amendment to existing SPG).

Proposal That Cabinet Members note the comments received, approve the recommended amendments to the documents and formally adopt the three Supplementary Planning Guidance documents.

Action by Head of Regeneration, Investment and Housing

Timetable Immediate

This report was prepared after consultation with:

- Chief Executive
- Head of Law and Regulation – Monitoring Officer
- Head of Finance – Chief Finance Officer
- Head of People and Business Change

Signed

Background

The Local Development Plan (LDP) was adopted by Full Council on 27th January 2015 and is used for development management purposes and determining planning applications. The LDP is accompanied by Supplementary Planning Guidance (SPG) covering topic areas and policies which require more detailed guidance. This report is considering the revision of two existing SPGs – Affordable Housing and Flat Conversions, and the creation of a new SPG providing guidance on shopfront design.

Shopfront Design SPG (New)

The design and appearance of commercial facades has a major role to play in maintaining and enhancing a quality built environment. Over time, building elevations can become degraded as a result of inappropriate additions, loss of original features and poor levels of maintenance, therefore it is important that changes to building facades complement the street scene and its character.

This SPG has been produced to add further guidance on Policies GP2 (General Amenity), GP6 (Quality of Design), CE7 (Conservation Areas) and Policies R1 – R11 (Retail Policies) within the context of design and appearance of shop fronts and associated paraphernalia.

The Supplementary Planning Guidance (SPG) aims to ensure the creation and maintenance of high quality shopfronts and to retain and reinstate traditional or historic facades through a set of 34 design notes. The design notes are principles that aim to ensure new and altered shopfronts respond to the local context. The SPG addresses both Traditional and Contemporary Shop Front Design as well as considering individual design elements including Fascia Design and Lettering; Signage and Advertising; Pilasters and Vertical elements; Windows & Doors; Suspended Ceilings and Mezzanines; Stall risers; Lighting; Canopies and Blinds; Materials; Colours; and Rainwater Goods.

Affordable Housing (update to existing SPG)

This SPG sets out the Council's requirements for affordable housing, to ensure new developments help to meet the City's housing needs and create mixed, sustainable communities. This SPG expands upon the planning policies set out in the adopted Local Development Plan and outlines how the Council expects affordable housing to be delivered as part of new residential developments.

Some minor, but important changes have been made:

- Historically, the Council has used the Three Dragons Toolkit to undertake viability appraisals. However, in order to 'future proof' this SPG, paragraph 1.9 and 4.25 now allow for other industry standard viability appraisals to be utilised. This recognises the ever-changing nature of the industry and ensures the Council can access the most up-to-date appraisal toolkits when negotiating S106 planning obligations;
- Minor change to paragraph 4.1 provides greater clarity on the types of dwellings that are subject to affordable housing commuted sum payments;
- In order to expedite the signing of S106 legal agreements, a minor change to paragraph 5.10 provides greater clarity on the documentation required by the Council's legal team;
- Minor change to paragraph 5.11 allows Legal Fees to reflect officer time, as opposed to a set fee. In addition, reference to the S106 Administration Fee is made to mirror the principal advice in the Planning Obligations SPG.

Flat Conversions (update to existing SPG)

This SPG aims to ensure that occupants of converted flats have reasonable living conditions, whilst also protecting the character and appearance of the built environment and the living conditions of existing dwellings.

The minor change at paragraph 2.1.1 states that bed-sits and studio flats are also classified as flats. This clarification ensures that the definition of a flat mirrors the classification outlined in the Planning Obligations SPG and, therefore, provides greater clarity when requesting affordable housing commuted sums.

Consultation

All three documents were subject to an 8-week public consultation from 4th February – 1st April 2021. Comments have been received and considered by officers. The tables noting all comments received and the recommended responses are available to view in Appendix 1. A summary of the key issues raised and main proposed changes to the SPGs are below.

Key Issues Raised and Councils proposed response

The key issues raised in relation to the **Shopfront Design SPG** as part of the consultation process were the clarification on design of both security measures, and buildings that do not naturally lend themselves to retail e.g. bank or public house to retail or leisure.

The design of security measures is clearly set out in an existing SPG (Security Shutters), the Shopfront Design SPG references this and it is not considered necessary to duplicate guidance. While the New SPG does not give specific details on conversion of a bank or public house to retail or leisure it is considered that the general design principles, set out in section 4 -7, are adequate to address most situations. It is considered that where specific advice on a scheme is sought this would be better dealt with by specific pre-application advice.

There were no key issues raised in relation to the **Affordable Housing SPG** as part of the consultation process only a note on inconsistency of text which has been resolved.

The key issues raised in relation to the **Flat Conversions SPG** as part of the consultation process were that some of the requirements of the SPG are overly prescriptive, e.g. including minimum size, layout and car & cycle parking and whether measures could be requested that could offset the potential increase in vehicle emissions use when converting from a single dwelling to a HMO. Also a request for greater clarity with regard to noise & ventilation attenuation for conversions.

While the concerns regarding the size and layout requirements of the SPG are noted, the Council consider they are necessary to ensure reasonable living conditions are maintained for all future occupants. With regard to car parking, each planning application is considered on its individual merits and it is noted that cycle parking forms part of overall measures to reduce the carbon footprint and suitable storages should be considered from the outset of the design rather than as an add on. It is noted the Flat Conversions SPG is mentioned in the Air Quality SPG (paragraph 4.5.9) which has greater detail on reducing the carbon footprint and improving air quality. In addition, Welsh Government has recently been out for consultation on an Electric Vehicle (EV) charging strategy which is expected to be included in Building Regulations. Specific advice on noise and ventilation would depend on the age, character and design of the individual building and while attenuation measures should comply with current industry standards, further advice is available from the Council's Environmental Health and Building Control Officers.

Summary of Proposed SPG Changes

All SPGs have been updated to reflect recent changes in national policy including the adoption of Future Wales: The National Plan 2040 (Feb 2021). There are minor changes recommended for the Shopfront Design SPG to reflect technical issues, for example replace an image of a recessed doorway with gate with a better example. There are only minor changes recommended to the Affordable Housing and Flat Conversion SPGs. Details of all changes made can be seen in Appendix 1.

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 SPG electronically from the Council website.

Risks

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
Clarity on the LDP policies is not provided and therefore potentially more open to interpretation and challenge.	L	L	The SPG will help to provide clarity and offer further guidance on LDP policies to aid the planning application determination process.	Head of Development Services/Planning Policy Manager
Draft SPG will carry less weight by Planning Inspectors in the determination of planning appeals.	M	L	The SPG has 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 the creation and maintenance of high quality shopfronts that respond to and enhance their local context.

Options Available and considered

- a) Approve all three of the draft SPGs for adoption.
- b) Make alternations to the draft SPGs and then approve for adoption.
- c) Do not approve any of the three draft 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 amendments have been made to the documents. The adopted SPGs will assist the Council in determining planning applications.

Comments of Chief Financial Officer

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

Comments of Monitoring Officer

There are no specific legal issues arising from the Report. The proposed SPG's set out more detailed practical and technical guidance regarding the application of the strategic land use policies contained in the LDP and provide a consistent approach for the determination of planning applications. The proposed

new shopfront SPG is intended to secure design quality in order to maintain the character and appearance of buildings, while the proposed revision to the Affordable housing SPG updates the existing guidance to amend the viability assessment process and the requirements for s106 agreements. The flat conversions SPG again updated the current guidance to provide greater clarity on the meaning of a "flat". The proposed SPG's have been the subject of public consultation for a period of 8 weeks and the consultation responses are set out in the report. The final SPG's will be a material planning consideration in the determination of relevant applications and greater weight can be attached to them because 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.

There is no requirement for a separate Equalities Impact Assessment (EIA) as mentioned in the appropriate section of the report.

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

Scrutiny Committees

The SPG has not been through a Scrutiny Committees.

Fairness and Equality Impact Assessment:

- **Wellbeing of Future Generation (Wales) Act**
- **Equality Act 2010**
- **Socio-economic Duty**
- **Welsh Language (Wales) Measure 2011**

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: The three 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.
- Shopfront Design SPG (New).** Improving design and appearance of commercial facades will help with the longer term goals of protecting and enhancing environmental quality, which can raise public aspirations, reinforce civic pride and create a sense of place helping to attract business, promote social inclusion and improve the quality of life creating a sense of place helping to attract business.
- Affordable Housing (update to existing SPG)** Improving both process and management aids the ability to deliver sustainable mixed communities.
- Flat Conversions (update to existing SPG)** Greater clarity of definition aids the ability to deliver sustainable mixed communities for future generations.
- 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 in such a detailed manner and providing further clarity on the existing Affordable Housing and Flat Conversions SPGs 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 could be 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, helping to attract business, promote social inclusion and improve the quality of life creating a sense of place. 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 encourage developers to consider how their development fits in with the existing context and enabling mixed communities integrates society at both a social and economic level.

Collaboration: These three guidance documents have been through 8-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, Community Councils, the Economic Development Officers business contacts 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.

The Equality Act 2010 identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. A Socio-economic Duty is also set out in the Equality Act 2010 which includes a requirement, when making strategic decisions, to pay due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage.

The Equality Act duties have been given due consideration in the creation of these SPGs and it is considered that there would be no significant or unacceptable impact upon persons who share a protected characteristic, over and above any other person, as a result of the proposed decision. There would also be no negative effects which would impact on inequalities of outcome which arise as a result of socio-economic disadvantage.

In terms of the Welsh Language, Section 31 of the Planning (Wales) Act 2015 clarifies that impacts on the Welsh language will be considered in the determination of planning applications. The impact on the Welsh Language has been considered. The adoption of these three SPGs will not have a material effect upon the use of the Welsh language in Newport. The SPGs will be translated into Welsh for publication.

An FEIA has not been undertaken specifically for these three SPGs. These three SPGs are supporting documents to the main Local Development Plan which has undergone an equality impact assessment along with a health impact assessment, Welsh Language and Sustainability Appraisal.

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

The three draft SPGs were subject to an 8-week public consultation from 4th February – 1st April 2021. Comments have been received from interested parties and considered by officers. The tables noting all comments received and the Council's proposed responses are available to view in Appendix 1.

Background Papers

- Shopfront Design SPG (New) – Version proposed for adoption



Shopfront Design
SPG (JUN 2021).docx

- Affordable Housing (update to existing SPG) - Version proposed for adoption



Affordable Housing
SPG (JUN 2021).docx

- Flat Conversions (update to existing SPG) - Version proposed for adoption





Flat Conversions
SPG (JUN 2021).docx

Dated: 7 October 2021

APPENDIX 1 –

COMMENTS RECEIVED ON THE SPG AND THE COUNCIL’S PROPOSED RESPONSE

Shopfront Design SPG (New)

From	Comment	NCC Response	Change to SPG
NCC Conservation Officer	It would be worth referring to the fact that guidance is available in Cadw documents (maybe a reference to “Managing Change to Listed Buildings in Wales”)	Reference to the guidance added to the end of paragraph 3.3. with a linked shortcut to: (below*)	Amendment to Paragraph 3.3: ... or listed building consent. General guidance on “Managing Change to Listed Buildings in Wales” is available from Cadw.
Newport Norse	Point 9.1.6 There is a spelling mistake it should be clerestories	Noted, SPG updated	Amendment to Paragraph 9.1.6: Treating clerestories (high level windows) in...
	Figure 29 is a bad photographic example in a guide as shows infill of the shopfront with blockwork and also as window narrowing with flush fitted timber windows.	While it is agreed the widow itself is not an example of good practice the image is used as an example of window sticker and not for the window itself.	No change
	Item 9.5.4 talks about gated entrance ways. There are good examples of this that could be included in the guide as photos that were completed on the Marks Building and the Buildings on Mariners Green. Images supplied: 	Andrew Herrington has agreed his photos can be used within the SPG (email 8/2/21)	Replace Image <i>Fig. 32 Recessed doorway detail with:</i> 



<p>Item 10.3 Should read Externally mounted Solid and Pinhole shutters.....</p>	<p>Paragraph 10.4 goes on to note <i>“Planning permission is required for all externally mounted security grills/shutters. Listed building consent is usually required if proposals for both externally and internally mounted grilles/shutters.”</i> i.e. permission is unlikely to be required for internally mounted security grills/shutters on non-listed buildings.</p>	<p>No change</p>
<p>Item 10.3 could be expanded to encourage roller shutters to be installed if required internally set well back from the shopfront to allow displays to be seen at night. This was done on all the regeneration scheme projects in Newport that I was involved with. Matthew Tribbeck and Gillian Lewis were the officers who I worked with who may be able to provide photographs of these installed. I can also search my photos if required.</p>	<p>Paragraph 10.5 and 10.6, encourages alternative solutions that negate the need for roller shutters.</p> <p>In addition, the paragraph 10.4 goes on to note that the Council’s Shopfront Security Shutters SPG gives greater detail on this matter in particulate sections 1.3 and 7 of the Security Shutters SPG.</p>	<p>No change</p>
<p>There could be some mention of how to convert or deal with buildings such as banks and public houses that are become shops or eating places possibly dealing with the subject of enlarging windows by lowering cills.</p>	<p>The SPG does provide general design principles in section 4 and 5 and goes on to talk about both traditional (section 6) and contemporary (section 7) shopfronts. However, it is not possible to cover every possible conversion scenario and specific advice will depend on the age, character and design of the building to be converted.</p>	<p>No change</p>

Natural Resources Wales	<p>We've no comments to make on the draft SPG's in terms of our role as a statutory planning advisor.</p> <p>In terms of your screening reports for both SEA and HRA, we note you have screened out the Plan. We have considered the reasons given and have no adverse comments on the matter. If you have any queries please do not hesitate to contact me.</p>	Comments noted, no amendments required.	No change
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*[https://cadw.gov.wales/sites/default/files/2019-05/20170531Managing% 20Change%20to%20Listed%20Buildings%20in%20Wales%2024303%20EN.pdf](https://cadw.gov.wales/sites/default/files/2019-05/20170531Managing%20Change%20to%20Listed%20Buildings%20in%20Wales%2024303%20EN.pdf)

Affordable Housing (update to existing SPG),

From	Comment	NCC Response	Change to SPG
Home Builders Federation	I note that at Para 1.9 the reference to Three dragon tool kit has been removed, however, para 4.25 still references it.	One paragraph does not contradict the other. The Three Dragons Toolkit is a recognised industry appraisal toolkit, but its omission from Paragraph 1.9 alludes to the fact that the Council may use other models in the future	Minor change to make it clear that other models can be used.
	Also I've not checked but I'm aware the ACG values changed in 2018 so should this have affected the figure at [step 4 para 5.4] If they have changed then will it have affected the figures in the commuted sum calculation table at the end of this section.	Any changes to commuted sums will be determined by historical sums received as a result of independent viability appraisals. Any changes will be reflected in the Annual Monitoring Report and the forthcoming review of the Local Development Plan	No change
NCC Senior Scientific Officer	I think there probably isn't anything I can add to the affordable housing one as this appears to relate more to the principles of allocation and level formulas; if it had covered design then I would have wanted it to include more on sustainability in terms of materials and heating systems e.g. ASHP. Air Quality should be covered through the AQ SPG as well but mentioning it wherever possible is good practice. The inextricable linkages between	These comments are noted, this SPG relates to the Council's requirements for affordable housing to be provided.	No change

	climate change, sustainability, and air quality need to be recognised.		
Natural Resources Wales	<p>We've no comments to make on the draft SPG's in terms of our role as a statutory planning advisor.</p> <p>In terms of your screening reports for both SEA and HRA, we note you have screened out the Plan. We have considered the reasons given and have no adverse comments on the matter. If you have any queries please do not hesitate to contact me.</p>	Comments noted, no amendments required.	No change

Flat Conversions (update to existing SPG),

From	Comment	NCC Response	Change to SPG
NCC Senior Scientific Officer	The Flat Conversion SPG has the potential to create more units and potential car users, energy users where a previously single dwelling becomes two or more flats. I see that noise is mentioned in the SPG therefore AQ considerations and sustainable transport could be included e.g. need for EV infrastructure/provision to contribute to reducing vehicle emissions across NCC area. This principle can be applied whether in an AQMA or not.	<p>Noted. However, a contribution to EV would firstly need to be reflected in the 'principal' SPG i.e. the Planning Obligations SPG, as part of overall corporate priorities for new/converted dwellings. Any changes to the principal SPG would then be reflected in the Flat Conversion SPG (not vice versa).</p> <p>It is noted this is also mentioned in the Air Quality SPG (paragraph 4.5.9) and covered generally by Policies in the LDP. Welsh Government has recently been out for consultation on an Electric Vehicle (EV) charging strategy and it is to be inclusion in Building Regulations.</p>	No change
National Residential Landlords Association	The National Residential Landlords Association (NRLA) represents over 90,000 private sector residential landlords in England and Wales. The NRLA provides support and advice to members and seek to raise standards in the Private Rented Sector through our	Noted	No change

	<p>code of conduct, training, accreditation and the provision of guidance and updates on legislation affecting the sector.</p> <p>The NRLA applauds the acknowledgement from the LPA that supplementary planning guidance (SPG) is required for flat conversions. Given the proposed population forecasts for the City of Newport, which is fuelled largely by an increase in single occupancy and accommodation for couples, making the most out of existing building stock will be imperative to tackling housing issues within the city. Secondly, the Cardiff City Deal, discontinuation of Severn Bridge Charging and greater strategic alignment with the South West of England, may all contribute towards increased population growth.</p> <p>The NRLA also acknowledges when testing the soundness of the SPG and indeed the overall viability of the Local Development Plan, that consideration should be given to material planning considerations. However, given that we represent private rented sector landlords, we believe that it would be pertinent to include the views of our members within this response, which may fall outside of material planning conditions.</p>		
	<p>The Council's approach We welcome the council's recognition that flat conversions contribute towards the city's housing stock and that these can sometimes make more efficient use of existing buildings. We further commend the council's recognition that flat conversions can improve and maintain older buildings especially those that have been left empty for some time.</p>	Noted	No change
	<p>While we also recognise that inappropriate conversions can</p>	Noted	No change

	<p>deteriorate neighbourhood communities, create parking problems, and worsen living conditions, we particularly acknowledge that flat conversions can provide increased housing options, especially for low paid and vulnerable tenants. They also create communal living opportunities to tenants who may find that desirable such as students or contract workers.</p> <p>We also acknowledge all other general considerations and principles outlined in the consultation document.</p>		
	<p>Guidance notes The NRLA is supportive of local policy from objectives set in the SPG that reinforces the importance of ensuring development does not harm local characteristics or hinder nearby residents' quality of life. This is especially important in conservation areas and for listed buildings.</p>	Noted	No change
	<p>Living Conditions We recognise that the SPG outlines that converted flats should offer occupants reasonable levels of light, space, privacy, ventilation, peace and quiet, noise attenuation, outdoor amenity space, parking, cycle storage and bin/recycling storage.</p>	Noted	No change
	<p>The NRLA is supportive of planning policy which outlines adequate provision for waste, recycling, and composting facilities. We also agree that it is not always appropriate for converted flats to have individual access to amenity space, but every effort should be made to improve access where appropriate within the confines of the building. We agree that while this is often sought after by some tenants, especially for families, it is not always possible or even desirable to provide access to</p>	Noted	No change

	<p>amenity space, which could include gardens, washing space or balcony areas and that it simply a matter of choice for individuals on where they wish to live.</p>		
	<p>Internal layout We fully agree that converted flats should offer their occupants reasonable living conditions. However, following consultation with members for a similar local authorities' SPG, there was concern over prescribed minimum bedroom sizes.</p> <p>During that consultation, it was suggested that minimum bedroom sizes would be both overly prescriptive and unhelpful especially as the priority should be maximising the use of buildings and ensuring high quality. It is particularly important to be flexible when considering the existing layout of the building. It would be more sensible if the minimum flat size was guidance with exception being given to those designs that are being considerate of the building footprint and have provided extra effort in innovative storage space in design to counter the smaller footprint. Given that in many cases the layout of Newport city centre buildings will mean that one or two units in a sensible conversion that is sympathetic to the building will not meet the 32 sqm, it should be considered as acceptable where it is clear the building as a whole has different size units reflective of the building footprint.</p> <p>There is a danger that by limiting the size, particularly for studio flats, to 32m², that a negative impact could occur for housing options especially for those on low incomes. By limiting options through legislation, some low waged workers will have less</p>	<p>Noted, but minimum bedroom sizes are required to ensure reasonable living conditions for all.</p>	<p>No change</p>

	<p>housing options and might be limited to HMOs. While HMOs are highly desirable for some, it is a question of choice and not everyone wants to share facilities with other occupants. We believe that there are many examples of good accommodation that may fall below the proposed levels. It should also be made clear; the guidance will only legislate flat conversions going forward from policy implementation should proposals be agreed.</p> <p>Looking specifically at minimum sizes of bedrooms for studio flats, there is also a possibility that the size stipulations could restrict development potential in some instances, due to the floor plan and financial viability of conversions. In these circumstances, we believe smaller sizes should be considered. We also believe that minimum bedroom sizes for non-studio conversions are unhelpful as the space required is dependent on the make-up of the persons living in the dwelling and the number of people. Furthermore, such a policy could further restrict the critical need of family sized accommodation made up of three- and four-bedroom dwellings.</p>		
	<p>We also believe that it is not desirable to mandate the prohibition of living rooms positioned next to, directly above or directly below a bedroom, regardless of the building fabric and acoustic insulation. While we agree that noise attenuation should be maximised, to prohibit the position of living rooms in this fashion would be overly prescriptive.</p>	<p>Noted, but design and layout mitigation measures are required to ensure reasonable living conditions for all.</p>	<p>No change</p>
	<p>Design While we agree that external alterations should be in keeping with local characteristics and in appearance of the streetscape, we</p>	<p>Within reason, the SPG requires that external alterations should be in keeping with local characteristics, but each case</p>	<p>No change</p>

	<p>would point out that it is not always possible to fully match new doors and windows with existing sets especially for older properties, and that modern materials may provide better insulation, noise-proofing and energy efficiency than traditional.</p>	<p>will be dealt with on its individual merits</p>	
	<p>Noise We agree that developers of converted flats should ensure that dwellings in noisy areas should feature noise-attenuation and ventilation measures and that it is acknowledged that a degree of disturbance is to be expected especially in city centre areas. However, we would welcome more guidance for landlords and developers on this issue as everyone's expectation and threshold of what is considered noisy is different.</p>	<p>Noise-attenuation and ventilation measures should comply with Industry standards. Such reports should be submitted accompanying a planning application</p>	<p>No change</p>
	<p>Amenity space We agree that outdoor amenity space, whether a back garden or a patio, should be made available to the occupants of a converted flat, if possible. However, this should only be when access is reasonable depending on the property.</p>	<p>Noted</p>	<p>No change</p>
	<p>Access In terms of access, while we understand the reason behind recommending that access should be from the front of buildings and not from commercial areas, we believe that this proposal could be overly prescriptive, and it fails to acknowledge that for some properties, for example, end of terrace properties or those above commercial premises, access to the side or rear of dwellings would be better. .</p>	<p>Noted, but minimum standards are required to ensure reasonable living conditions for all.</p>	<p>No change</p>
	<p>Parking The NRLA are supportive of any measures and policies that encourage walking, cycling and the improved use of sustainable public transport. In this context, we recognise that parking is a key</p>	<p>Noted. Each planning application is considered on its individual merits.</p>	<p>No change</p>

	<p>local issue with residential development and are generally supportive of proposed maximum car parking spaces. That said we are concerned that planning applications will be refused for those that are reliant on street parking. We believe that such applications should be treated on a case by case basis and how parking will impact the local community.</p>		
	<p>With regards to the storage of cycle parking, we believe it is not always possible to provide specific cycle storage outside of corridors or informal arrangements and that it is especially prohibitive with larger converted units.</p>	<p>Noted. Cycle parking forms part of overall measures to reduce the carbon footprint. Notwithstanding that, each application will be considered on its individual merits</p>	<p>No change</p>
	<p>Conclusion The NRLA is grateful for the opportunity to express our views on the SPG for flat conversations. We support many aspects of the SPG but would be grateful for consideration over our comments. We would also be grateful if the planning authority could clarify their position around developer's contributions especially towards local infrastructure and affordable housing?</p>	<p>Noted. The Planning Obligations SPG (January 2020) outlines the Council's position regarding infrastructure and affordable housing provision</p>	<p>No change</p>
<p>Natural Resources Wales</p>	<p>We've no comments to make on the draft SPG's in terms of our role as a statutory planning advisor.</p> <p>In terms of your screening reports for both SEA and HRA, we note you have screened out the Plan. We have considered the reasons given and have no adverse comments on the matter. If you have any queries please do not hesitate to contact me.</p>	<p>Comments noted, no amendments required.</p>	<p>No change</p>