



LRJ PLANNING

Planning, Design and Development

PLANNING STATEMENT

PROPOSAL: FULL PLANNING APPLICATION FOR THE CONVERSION OF THE FIRST FLOOR TO CREATE TWO FLATS (C3 USE)

CLIENT: J.A.K.S DEVELOPMENTS LTD

SITE: 47 DUCKPOOL ROAD, NEWPORT, NP19 8FL

DATE: NOVEMBER 2025



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1.0 Introduction

- 1.1 This Planning Statement has been prepared by LRJ Planning Ltd on behalf of J.A.K.S Developments Ltd to accompany the full planning application for the creation of two flats at 47 Duckpool Road, Newport, NP19 8FL
- 1.2 This Planning Statement describes the proposals, related key material considerations in determining the application, and benefits which will be delivered. Furthermore it reviews and demonstrates compliance with the approved relevant development plan policies and national planning policy.
- 1.3 This statement should be read in conjunction with the following plans and documents that accompany the application and comprise:
 - Application form and certificates;
 - Existing and proposed floor plans;
 - Existing and proposed elevations;
 - Flood Consequences Assessment.

2.0 Site Description

- 2.1 The application site comprises a two-storey end-of-terrace corner property situated at the junction of Duckpool Road and Bristol Street. The ground floor and part of the first floor, fronting Duckpool Road, were most recently occupied as office accommodation associated with a mental health charity (Use Class B1). The remainder of the first floor is in separate use as a two bedroom residential flat (Use Class C3).



Figure 1 – Aerial photograph of application site



2.2 The property occupies a sustainable location within the settlement boundary, as well as being within walking distance of a bus route with regular services.

3.0 Planning Designations and Background

3.1 The Site is not subject to any designations as defined by the Council's adopted Policies Map.

3.2 The Site is not within, or immediately adjacent to, designations for valued landscapes, such as local landscape designations, AONBs or National Parks.

3.3 There are no designated heritage assets within the vicinity of the site.



3.4 Application reference 23/0217 sought full planning permission for the conversion of the existing building into one two-bedroom flat and three one-bedroom flats, including associated external alterations. The application, submitted on 20th June 2023, was refused on 14th September 2023 for the following reasons:

1. The site's location in an area at risk of flooding was considered to have a significant adverse impact on safety and residential amenity, with no submitted information to mitigate this, contrary to Policies SP3 and GP1 of the Newport Local Development Plan (2011–2026) and TAN15: Development and Flood Risk.
2. The proposal failed to address affordable housing requirements, as no signed legal agreement was provided for the required commuted sum, contrary to Policy H4 of the Newport Local Development Plan.

4.0 Proposal

4.1 Planning permission is sought for the conversion of the first floor space to create two flats (C3 use). Both flats will have two bedrooms with separate access off Bristol Street. Both flats will have separate bin and bike storage within a lobby area. The ground floor will continue to comprise offices (B1 use).



Proposed Layout



5.0 Planning Policy Context

5.1 The planning policy framework for the determination of this application is provided by the content and scope of National Planning Policy, which is contained within the Wales Future Plan, Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the Development Plan for the local area.



Planning Policy Wales (12th Edition)

- 5.2 PPW identifies that as part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs) and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement. PPW adds that:

“A broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor’s surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.”

Development Plan

- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

- 5.4 Part 2 (Sustainable Development) of the Planning (Wales) Act 2015 says the following:



1. *This section applies to the exercise by the Welsh Ministers, a local planning authority in Wales or any other public body—
 - (a) of a function under Part 6 of PCPA 2004 in relation to the National Development Framework for Wales, a strategic development plan or a local development plan;
 - (b) of a function under Part 3 of TCPA 1990 in relation to an application for planning permission made (or proposed to be made) to the Welsh Ministers or to a local planning authority in Wales.*
2. *The function must be exercised, as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015 for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.*

5.5 The Newport Local Development Plan (LDP) to 2015 is the development plan for the purposes of the Planning and Compulsory Purchase Act 2004. The relevant polices are referred to below.

- SP1 Sustainability;
- SP3 Flood Risk;
- SP9 Conservation of the Natural, Historic and Built Environment;
- S13 Planning Obligations;
- SP18 Urban Regeneration;
- GP2 General Amenity;
- GP4 Highways and Accessibility;
- GP5 Natural Environment;



- GP6 Quality of Design;
- GP7 General Development Principles;
- W3 Provision for Waste Management Facilities in Development
- H2 Housing Standards;
- H4 Affordable Housing;
- H8 Self Contained Accommodation and Houses in Multiple Occupation; and
- T4 Parking.

5.6 The following supplementary Planning Guidance is relevant to the proposals:

- Parking Standards
- Air Quality
- Waste Storage and Collection
- Flats Conversions

6.0 Planning Appraisal

6.1 This section seeks to highlight the main issues relevant to the determination of the application and assess the scheme against the local and national planning policies referenced in section 5.0 above.

6.2 The main issues that are considered to be relevant in this case include:

- The principle of development in relation to land use planning policy and sustainable development;
- The effect the proposal will have on the character and appearance of the area;
- Amenity for future occupants;
- The impact on the amenity of neighbouring properties; and



- Parking and servicing arrangements.

i) Principle of Development

6.3 Both local and national planning policy supports the provision of sustainable development and promotes the provision of development within the defined urban boundary. Policy SP1 of the LDP seek the efficient use of land within the urban boundary and there is a presumption in favour of sustainable development, subject to other material considerations.

6.4 Policy H8 of the LDP identifies that:

“Within the defined settlement boundaries, proposals to subdivide a property into self contained accommodation, bedsits or a house in multiple occupation will only be permitted if:

- i) the scale and intensity of use does not harm the character of the building and locality and will not cause an unacceptable reduction in the amenity of neighbouring occupiers or result in on street parking problems;*
- ii) the proposal does not create an over concentration of houses in multiple occupation in any one area of the city which would change the character of the neighbourhood or create an imbalance in the housing stock;*
- iii) adequate noise insulation is provided;*
- iv) adequate amenity for future occupiers.”*

6.5 The creation of two additional two bedroom residential units, along with the retention of commercial space at ground floor is considered to be acceptable and represents an efficient re-use of the property, which also offers regeneration benefits. The proposal is compliant with both local and national planning policy.



ii) **Character and Appearance**

6.6 Policy GP2 of the LDP seeks to promote good design and that new development must have full regard to the context of the local natural and built environment, and promotes the use of local distinctiveness through sympathetic design and material selection.

6.7 No external alterations are required. As a result, the proposal will maintain the character and appearance of the area, thus complying with

iii) **Amenity for future occupants**

6.8 The proposed two flats with two bedrooms has been designed to deliver a high standard of residential amenity for future occupants. The internal layout achieves a Gross Internal Area of both flats exceed the 58 sqm, fully in line with the locally described space standard for a two-bedroom converted units, thereby ensuring that the accommodation provides adequate space for day to day living activities, storage, and circulation.

6.9 The arrangement of the unit will secure good levels of natural light and ventilation, creating a comfortable living environment. Given the sustainable and accessible location of the site, the dwelling will provide an appropriate standard of amenity while making efficient use of land in accordance with local and national planning policies.

iv) **Neighbour Amenity**

6.10 Policy GP2 and H8 of the LDP seeks to ensure that proposals would not have a detrimental impact on the amenity of neighbouring properties.



- 6.11 The surrounding area is urban and built up with tight grain development close to a raft of local amenities. There is no evidence to suggest that the creation of an additional flat would have any impact on neighbour amenity. The proposed use is commensurate to the size of the property, and would not undermine the amenity of the neighbouring properties, through any increase in noise and disturbance.
- 6.12 Overall, the proposal would not materially harm the amenity of neighbouring properties and therefore accords with Policies GP2 and H8 of the LDP.

v) Parking and Servicing

- 6.13 The property occupies a highly sustainable location within walking distance from services and amenities, as well as public modes of public transport.
- 6.14 The property is located in a highly sustainable location. This is based on the fact that as stipulated in paragraph 4.4.1 of Manual for Streets (MfS), walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas, which residents may access comfortably on foot. It is recognised that this is not an upper limit and PPS134 states that walking offers the greatest potential to replace short car trips, particularly those under 2km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.
- 6.15 The property is located within a sustainable location with easy access to services and amenities. As a result, occupants will enjoy easy access to shops, services and facilities as well as local employment opportunities, therefore reducing the reliance on the private car. This accords with the overarching pursuit of sustainable development set out in Planning Policy Wales. Given the proximity to a range of local services, the absence of off-street parking is fully justified.



vi) Flood Risk

- 6.16 The Flood Consequence Assessment identifies that the site has finished floor levels ranging from 7.58mAOD to 8.03mAOD, remaining unchanged from the existing building. A Flood Consequence Assessment has been undertaken in accordance with TAN15 (2025). The assessment indicates that the site is not at risk of present-day tidal flooding; however, it may be affected during extreme events accounting for climate change, with maximum projected flood depths of 0.54m during a 0.5% AEP + climate change event and 1.45m during a 0.1% AEP + climate change event.
- 6.17 To enhance flood resilience, the following measures are recommended at the detailed design stage:
- Flood-resilient doors and windows or deployable flood barriers.
 - Flood-resilient flooring, skirting, and wall finishes.
 - Sump or puddle pumps to remove floodwater.
 - Raised electrical sockets and wiring to a minimum of 0.6m above floor level.
 - No sleeping accommodation on the ground floor; ground floor to remain for commercial use.
- 6.18 For safety, it is recommended that site owners and future occupiers register with the NRW Flood Warning Service and follow established evacuation procedures if required. The assessment confirms that existing drainage arrangements will remain unchanged, and, with the above mitigation measures, the development meets the criteria set out in TAN15 for flood consequences.



7.0 Conclusion

- 7.1 This statement has identified that the proposed development complies with national and local planning policy. The Council's decision on the planning application must be taken in accordance with the development plan unless material considerations indicate otherwise. In light of the schemes accordance with the development plan, it is respectfully requested that planning permission is granted.