



LRJ PLANNING

PLANNING, DESIGN AND ACCESS STATEMENT

Demolition of the existing garage, the erection of two-storey extensions at the rear and the change of use the former funeral directors (A1 use) to facilitate the creation of 5 flats for specialised supported housing (C3 Use) and overnight accommodation for care provider at 140 Caerleon Road, Newport, NP19

7GS



1.0 Introduction

- 1.1 This Statement has been prepared by LRJ Planning Ltd to accompany this full planning application for the demolition of the existing garage, the change of use of the funeral directors (A1 use) and the erection of two-storey extensions at the rear to facilitate the creation of 5 flats for specialised supported housing (C3 use) at 140 Caerleon Road, Newport, NP19 7GS.
- 1.2 This Statement provides a planning analysis to demonstrate that the submitted proposal is acceptable in planning terms and in accordance with the relevant policy and guidance.
- 1.3 The application is supported by a site layout plan, floor plans, full elevational plans which illustrate that the site is capable of accommodating the development and its associated works, including access.
- 1.4 The remainder of this Statement is structured as follows:
- Section 2: Site Location and Description
 - Section 3: Background
 - Section 4: Development Proposal
 - Section 5: Planning Policy Context
 - Section 6: Design and Access
 - **i) Layout and Density**
 - **ii) Scale**
 - **iii) Appearance**
 - **iv) Materials detailing**
 - **v) Access**
 - Section 7: Planning Analysis
 - **A) The principle of development**



- **B) Impact on Character and appearance**
- **C) Impact on residential amenity**
- **D) Access and Parking**
- Section 8: Conclusion

2.0 Site Location and Description

2.1 The application site comprises an existing two-storey detached bay fronted property, which was formerly used as a funeral directors (A1 use). The property is located at the eastern side of Caerleon Road at the junction with Morden Road. The site has an area of some 0.04 hectares. The location of the site is illustrated in Figure 1, below.



Figure 1: Site Location

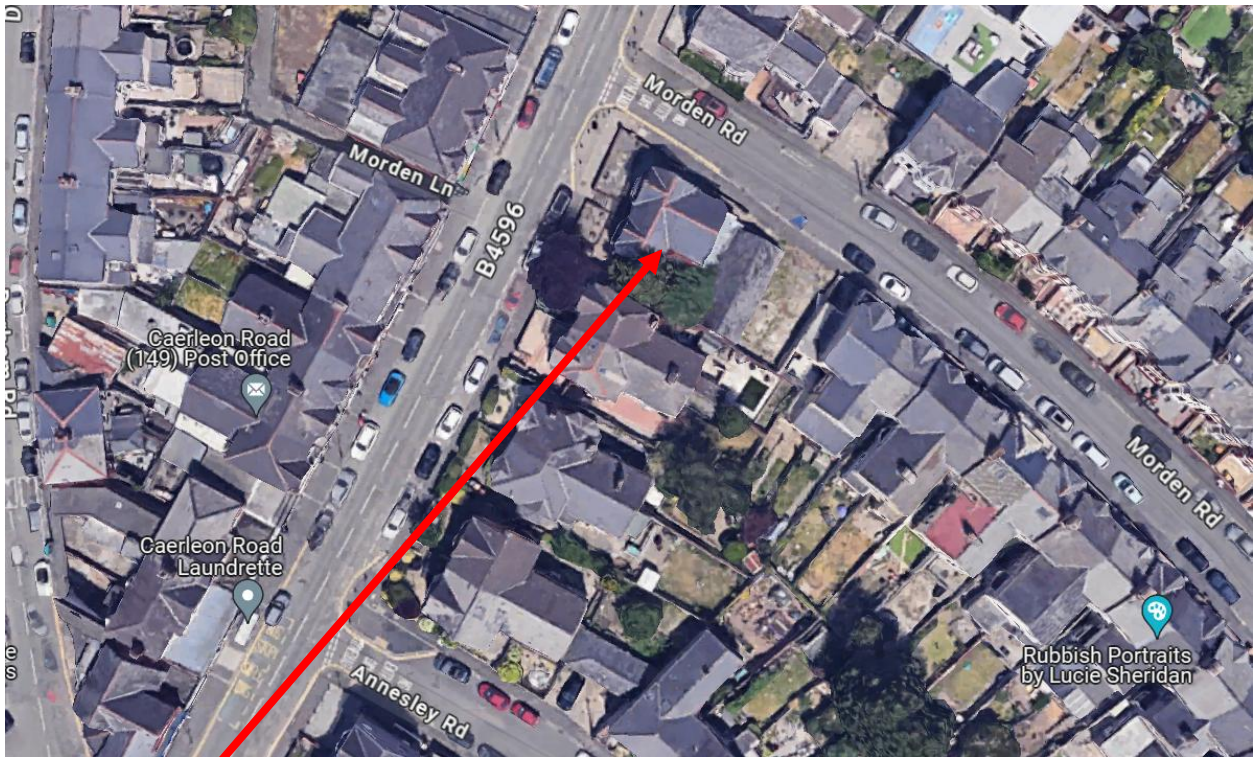


Figure 2: Aerial View

- 2.2 The site lies opposite the Caerleon Road District Centre and within a row of established residential properties. There are several local services, facilities and amenities within close proximity of the site.
- 2.3 The surrounding properties are of a similar vintage.
- 2.4 It must be appreciated that the property is not within a designated Conservation or Article 4 area, nor is the building Listed.



3.0 Background

3.1 The applicant has sought a collaborative approach with the Council and obtained paid pre-application advice for a scheme that consisted of the demolition of the existing garage and the erection of a two-storey extension to facilitate the creation of 7 apartments and 1 maisonette.

3.2 Details of the layout and design approach of that scheme is illustrated below.



Figure 3 – Proposed elevations and elevation facing Morden Road

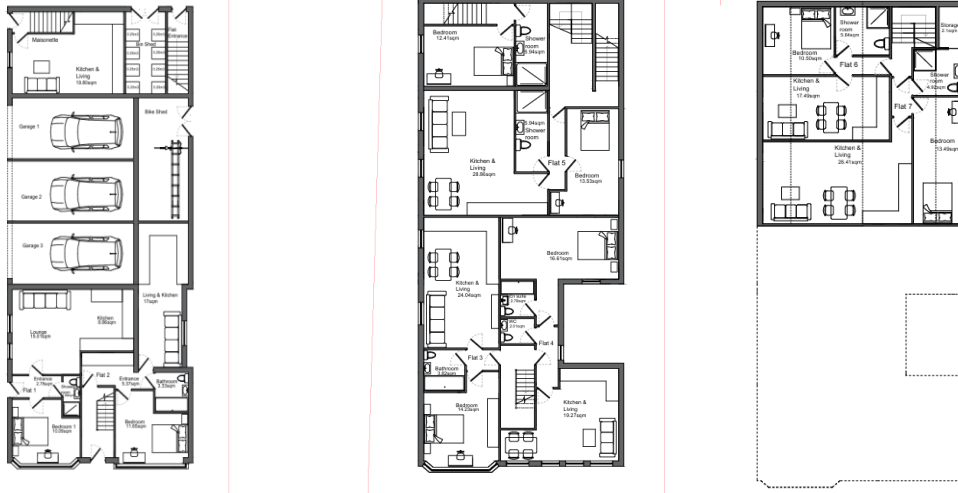


Figure 4 – Proposed floor plans

3.3 The pre-application advice received under planning reference: PRELET/PS/24/0045 on 21st May 2024 is summarised below:

- The proposal for converting the vacant building to residential use is acceptable in principle.
- The proposed two-storey rear extension is considered overbearing, causing overdevelopment, loss of light, and privacy issues for neighbours, conflicting with policy GP6.
- Internal floorspaces do not meet standards, and there is a lack of outdoor amenity space.
- Insufficient parking provision poses highway safety and efficiency concerns.
- Noise mitigation and air quality assessments are necessary due to the site's location.
- No significant ecological impacts, but a landscape enhancement plan and a tree survey are required.

4.0 Proposal

4.1 The proposal has been designed to address the concerns raised in the pre-application response with a complete redesign of the extension proposed along



with a reduction in the number of units and the provision of enhanced levels of communal amenity space. In addition, the following reports have been commissioned and accompany this submission:

- Commissioner Supporting Letter for the development of Supported Housing Accommodation on 140 Caerleon Road, Newport
- Noise Impact Assessment;
- Air Quality Assessment;
- Tree Survey;
- Landscaping Plan;
- Green Infrastructure Statement;
- Position Statement – Planning Contributions.

4.2 Full planning permission is sought for the for the demolition of the existing garage, the change of use of the funeral directors (A1 use) and the erection of a two-storey extension to facilitate the creation of 5 flats for specialised supported housing.

4.3 The proposed development is intended to deliver high-quality supported accommodation for up to five individuals with learning disabilities, autism, mental health conditions, and/or physical disabilities, including wheelchair users. The scheme is carefully designed to provide a safe, accessible, and supportive living environment tailored to the complex and varied needs of its residents. It includes two fully DDA and Part M compliant units to ensure full accessibility for wheelchair users and those with mobility impairments. This type of accommodation offers a genuine alternative to institutional care, allowing residents to live more independently within the community while receiving the assistance they need. Specialist Supported Housing (SSH) not only delivers significantly improved outcomes for vulnerable individuals but also contributes to savings for the public purse by reducing reliance on costlier forms of care provision.

4.4 In the supporting letter from the Commissioner, Newport City Council has confirmed its commitment to commissioning these properties for the provision of



specialised supported housing, ensuring that suitable service users are appropriately housed and cared for. Each individual identified for this scheme will receive continuous, round-the-clock support, with a care provider available 24 hours a day, seven days a week, to meet their specific needs.

- 4.5 Given the significant level of support required, the individuals who will reside in this accommodation would not be capable of living independently without structured assistance. The development, therefore, represents an essential resource in meeting their housing and care needs, enabling them to live in a community setting while benefiting from a comprehensive support framework tailored to their well-being and personal development.
- 4.6 The proposal includes the provision of two extensions at the rear of the property, which will both be two-storey. The extensions have been significantly reduced in size, but follows the general footprint of the outriggers at neighbouring properties. The main two-storey rear extension follows the building line of Morden Road, and will appear as a subservient addition in the street scene and with the removal of the dilapidated garage will represent a betterment to the existing situation. Full planning drawings accompany the submission, but the architectural approach is shown below.





Figure 5 – Proposed Elevations and Architectural Approach

4.7 The proposal aims to deliver five flats with a communal lounge and overnight accommodation of carers. The occupants of all flats will enjoy access to communal amenity space. Bin and bike storage is proposed at the rear with a dedicated off-street parking space accessed off Morden Road for a carer.

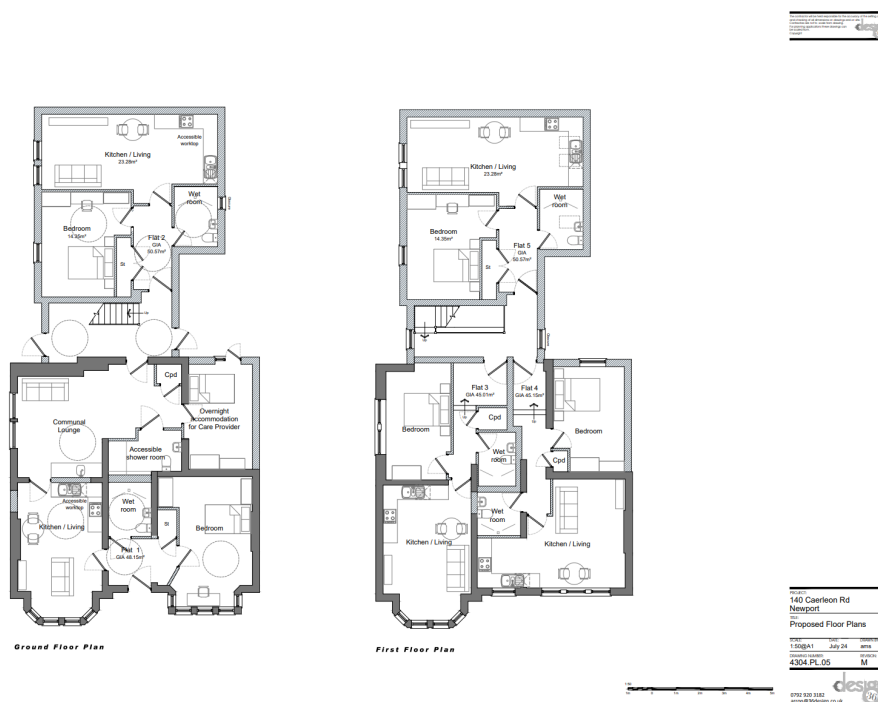


Figure 6 – Proposed Floor Plans

4.8 It should be noted that the operational model for the development has been carefully structured to ensure long-term stability and sustainability. Upon practical completion, the property will be granted on a long-term lease to a Registered Provider of Social Housing, with the intention of creating permanent, life-long homes for the Specialist Supported Housing (SSH) tenants. The future residents, by nature of their disabilities and support needs, will not hold driving licences, which inherently minimises the demand for on-site car parking and reduces any potential impact on local highway networks. In parallel, the development will provide ongoing local employment opportunities for care staff, with a dedicated support team commissioned to deliver 24/7 on-site assistance tailored to the



residents' individual care plans. This integrated approach supports not only the independence and wellbeing of vulnerable individuals but also contributes positively to the local social care economy.

- 4.9 Finally, the applicant would also like to inform Newport City Council that they are concurrently progressing with the SAB (Sustainable Drainage Approval Body) planning process. The pre-application for SuDS approval (reference 23551444) was submitted on Wednesday, 28 May 2025. It is anticipated that the Pre-Application Advice Meeting will be scheduled within the next five working days, allowing any technical queries to be addressed promptly and ensuring compliance with the Council's requirements.

5.0 Planning Policy Context

- 5.1 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.”

- 5.2 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.

5.3 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 policies are referred to below.

- SP1 Sustainability;
- GP2 General Amenity;
- GP4 Highways and Accessibility;
- H8 Self Contained Accommodation and Houses in Multiple Occupation; and
- T4 Parking.

6.0 DESIGN AND ACCESS

6.1 The design policies outlined in the development plan emphasise the importance of context and character. Development within existing areas must respond to and respect the inherent layout, density, scale, appearance, materials, and access of the surroundings. The following sections provide an overview of how these considerations have been incorporated into the proposal, which will be examined in greater detail in the subsequent Planning Appraisal section.

i) Layout and Density

6.2 The design of the development has been carefully crafted, taking into account the constraints of the application site, including its access and relationship with neighbouring properties, as well as the layout of the surrounding built environment.



This approach aims to create a distinct identity and sense of place for the development. The design has been sensitively tailored to address site-specific challenges, incorporating feedback from the pre-application consultation.

- 6.3 The surrounding area is characterised by high-density residential development. The proposed layout leverages the available space to achieve a density that is in harmony with the surrounding area's layout and density. This is accomplished through the demolition of the existing garage and the addition of a carefully designed two-storey rear extension.
- 6.4 The residential development has been oriented to maximise solar gain and passive heating, enhancing its sustainability.
- 6.5 The design ensures adequate separation between neighbouring properties, thereby protecting local residential amenity. Moreover, the windows on the side elevation will be obscurely glazed as they do not serve habitable rooms.
- 6.6 Internally, the development is designed to offer generous amenity space for future residents, ensuring that all bedrooms and living areas are well proportioned and equipped with necessary facilities. All occupants will have access to areas of communal amenity space.
- 6.7 Overall, the layout and density are well-suited to the plot and respect the character of the surrounding townscape.

ii) Scale

- 6.8 The scale of the building has been thoughtfully considered, drawing on the prevailing two-storey scale of the surrounding area. The design is aligned with the scale of the site and incorporates elements that address the constraints of the site, making the architectural design integral to the overall scheme.
- 6.9 Efforts have been made to minimise bulk and massing, reducing potential impacts on local amenities by avoiding issues of overlooking or overshadowing.



iii) Appearance

6.10 The property's appearance is designed to reflect high-quality, minimalist aesthetics, featuring glazing and high quality external materials.

iv) Materials Detailing

6.11 The development will use high quality materials that echo the local character, including render and synthetic slate roofs.

6.12 Material samples are available for review by the Local Planning Authority to demonstrate their quality and durability.

v) Access

6.13 The development will be accessed via pedestrian entrances from both Caerleon Road and Morden Road. The proposal also encourages active travel by including secure bicycle storage.

7.0 Planning Appraisal

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

7.2 In formulating the proposal, special regard has been given to the more detailed requirements of the development plan, as well as the paid pre-application advice provided by the Council. The requirements and standards of these documents have heavily influenced the final scheme, ensuring that a development of the highest possible quality, appropriate to its setting, is submitted for approval.

7.3 The main issues that are considered pertinent to the appraisal of this proposal are:

- The principle of development.
- The design of the proposal.
- The level of amenity for future occupants.



- Relationship with neighbouring properties.
- Access and parking arrangements.
- Air quality.
- Noise.
- Trees and green infrastructure.

A) The principle of development

7.4 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.

7.5 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.”*

7.6 The principle of the change of use of this property within the defined settlement boundary to create a much needed scheme for specialised supported housing is



considered to be acceptable and represents an efficient re-use of this vacant property. The proposal is compliant with both local and national planning policy.

B) Character and appearance

- 7.7 Policy GP2 of the Local Development Plan (LDP) advocates for good design, requiring new developments to fully consider the local natural and built environment and to incorporate local distinctiveness through sympathetic design and material selection.
- 7.8 The proposed development aims to function well and contribute positively to the area's quality over its lifetime. It will be visually attractive, sympathetic to the local character and context, and maintain a strong sense of place and distinctiveness.
- 7.9 A high-quality approach has been employed to optimise the site's capacity, balancing the goal of delivering housing with the pre-application advice offered.
- 7.10 The design of the proposed development has been informed through detailed and collaborative consultation with key stakeholders, including the Local Authority's Adult Services Commissioner, care provider Priory Group, and the registered provider, Reside with Progress. This engagement has ensured that the scheme is not only responsive to identified local need but also aligned with best practice in the delivery of sustainable Specialist Supported Housing (SSH). The layout, facilities, and accessibility standards have been carefully tailored to meet the complex requirements of future residents, while supporting long-term operational viability and integration within the wider care pathway. This partnership-led approach highlights the development's role in delivering high-quality, person-centred accommodation that promotes independence, stability, and social



inclusion. The scheme has been carefully designed to reflect the local context in terms of scale, orientation, character, and appearance. The design process has thoroughly addressed pre-application concerns, including reducing the size and mass of the development and removing the previous dormers.

- 7.11 The high-quality architecture, along with enhancements to the existing site's use and appearance, will protect and improve the town's character, architectural diversity, and natural environment.
- 7.12 The development will also enhance the sense of character and community by revitalising the property, improving visual amenities, and introducing an iconic development of the highest standard. This will strengthen the immediate setting, local identity, and sense of place.
- 7.13 The proposal is fully keeping with the prevailing pattern of development and with the bay frontage facing Caerleon Road, it will ensure the provision of a high quality scheme. The two storey extension, with a lower ridge height, appears subservient, replacing the incongruous garage at the site. The rear extensions will not detract from the character or appearance of the existing area. Instead, it will enhance the Morden Road streetscape by providing an active and vibrant frontage.
- 7.14 The proposal incorporates local materials that are sympathetic to the area's character and detailing, thereby strengthening local distinctiveness, property diversity, and identity.
- 7.15 Overall, the development is in keeping with the nature and character of its immediate setting. It will enhance the character and appearance of this part of the streetscape. As detailed in this section, the proposed development complies with the key themes of the design policies contained in the LDP.



C) The design of the proposal and its impact on the character Amenity for future occupants

7.16 The Council's SPG relating to flat conversions provides a raft of guidance in respect of internal space standards.

7.17 The flats will be single occupancy and have been designed so that they all satisfy the Council's internal space standards as follows:

- Flat 1 – 48.15sqm
- Flat 2 – 50.57sqm
- Flat 3 – 45.01sqm
- Flat 4 – 45.15 sqm
- Flat 5 – 50.57sqm

7.18 All residents will also enjoy access to the communal lounge as well as communal amenity space at the property. This is considered to be a sufficient level of space for sitting outside, as well as allowing for the drying of clothes. In addition, future occupants will also enjoy easy access within walking distance to Brecon Park (450m), Woodland Park (800m) and The Gleblands (under 1km).

7.19 Given the light spacious and airy feeling of the flats proposed will provide a high quality living environment for future occupants. Furthermore, the property enjoys a sustainable location with easy access to services and amenities as well leisure opportunities including areas of public open space.

C) Relationship with Neighbouring Properties

7.20 As detailed earlier, the sensitive design and position of the development in respect of neighbouring properties ensures that the scale, massing and prominence of the



development is reduced, favouring the amenities of local residents by preventing an overbearing impact, a loss of light, or overshadowing.

- 7.21 The proposed design and floor layouts have been set to protect privacy between residents and adjacent buildings.
- 7.22 As detailed earlier, the scale, massing and prominence of the development is reduced, favouring the amenities of local residents by preventing an overbearing impact, a loss of light, or overshadowing.
- 7.23 In terms of privacy, the development would be sufficiently distant from all neighbouring properties as to prevent overlooking or a loss of privacy. The windows on the side elevation serve non-habitable room windows and will be obscurely glazed. As such, there would be no material overlooking or loss of privacy.
- 7.24 Overall, the proposal would therefore accord with policy GP6 of the LDP.

D) Access arrangements and Parking

- 7.25 One of the key objectives of the national planning policy is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus development in locations which are or can be made sustainable and accessible.
- 7.26 Support is given to schemes where opportunities to promote sustainable transport modes can be taken, the number and length of journeys needed for a range of uses can be minimised, and safe and suitable access to the development site can be achieved for all users.
- 7.27 The development will be one that will be car free for residents as they will not own a car, but is also seeking to promote sustainable forms of travel and encourage active travel as promoted by the Welsh Government. Once space for a care



provider is provided with access off Morden Road. It is notable that the parking space will also have an electric vehicle charging point.

- 7.28 Indeed, the national planning policy context is importation. The Future Wales Plan sets out the direction for development in Wales to 2040. Policies 11 and 12 relate to national and regional connectivity, respectively. These seek to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. In urban areas, to support sustainable growth and regeneration, the priorities are improving and integrating active travel and public transport. In rural areas the priorities are supporting the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services. Active travel must be an essential and integral component of all new developments.
- 7.29 Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.
- 7.30 Planning Policy Wales (12th edition) at Paragraph 4.1.10 states that “the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
 - are designed in a way which integrates them with existing land uses and neighbourhoods; and
 - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.”



7.31 PPW advocates a sustainable transport hierarchy for planning, the hierarchy being, from top to bottom:

- Walking and Cycling
- Public Transport
- Ultra Low Emission Vehicles
- Other Private Motor Vehicles

7.32 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles.

7.33 PPW recommends (4.1.51) that “a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed”.

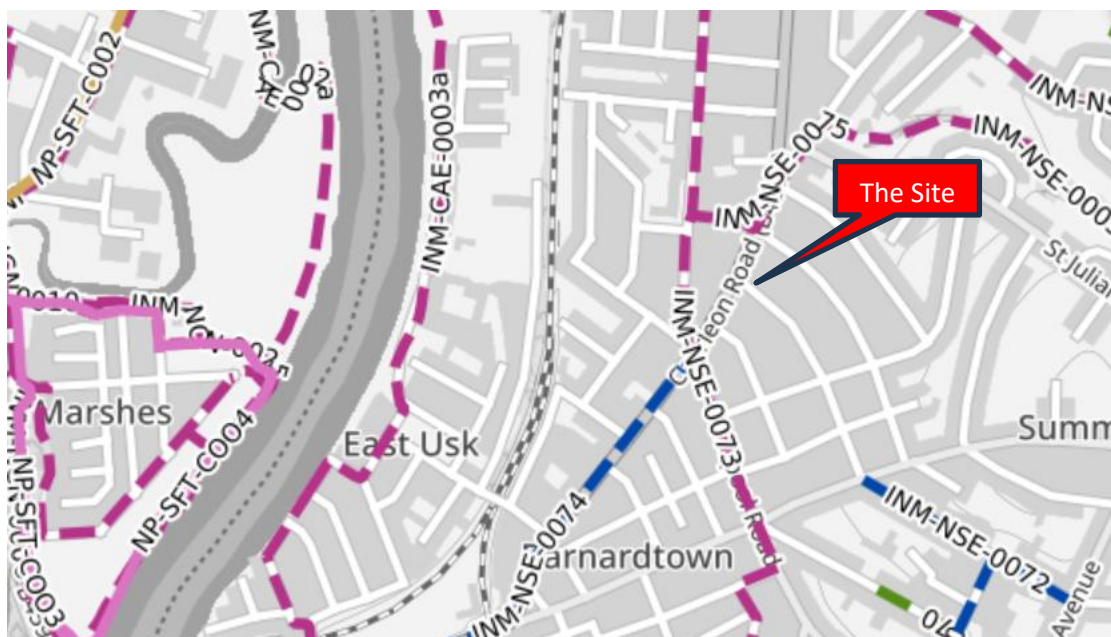
7.34 The Active Travel (Wales) Act 2013 is Welsh Government legislation aimed to support an increase in the level of walking and cycling in Wales; to encourage a shift in travel behaviour to active travel modes, and to facilitate the building of walking and cycling infrastructure.

7.35 The Active Travel (Wales) Act 2013 requires local authorities in Wales to produce maps of walking and cycling networks in their local area, known as Active Travel Network Maps (ATNMs). These maps are designed to show two main things:



- **Existing routes** – those current walking and cycling routes that already meet Welsh Government active travel standards, meaning they can be readily used for everyday journeys, and
- **Future routes** – new routes that the local authority proposes to create in the future, as well as current routes that are planned for improvement to bring them up to the standards.

7.36 An extract from the ATNM is provided below and shows that there are proposals for walking and cycling active travel route that will pass close to the site.



- | | |
|-------------------------------------|-----------------------------------|
| Existing walking routes | Future walking routes |
| Existing cycling routes | Future cycling routes |
| Existing walking and cycling routes | Future walking and cycling routes |

7.37 The Funeral Directors falls within use class A1, so the property could legitimately open as a convenience store, which would generate a higher level of traffic to an from the site.



- 7.38 Notwithstanding the above, the proposal seeks to promote sustainable forms of travel and this is aided through the provision of a dedicated, safe and secure bike store.
- 7.39 In addition, there has been a change in emphasis in national planning policy, away from the reliance on the use of the private car and the provision of sustainable forms of transport.
- 7.40 The property is located in an accessible and sustainable location within easy walking distance of established residential areas, as well as a frequent bus service including bus stops (three bus stops within a 2 minute walking distance) cater for travel in both directions, that connects the site with the wider area.
- 7.41 With regards to the Council's parking standards, it is considered that they have been rigidly applied. It is contended that the SPG document represents guidance only and should not applied in such a prescriptive way as is the case. Indeed, paragraph 4.1.52 of PPW states that *"parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high quality places."*
- 7.42 It is considered that in this case, given the location of the property and the proximity to sustainable forms of transport, the shortfall of off-street parking is one that is fully justified, given that the streets surrounding the site are subject to a 20mph speed limit.
- 7.43 Overall, existing parking restrictions are in in place to control indiscriminate parking and given the low vehicle speeds, future occupants will also benefit from easy access to frequent bus service. However, the development will be particularly beneficial to residents that have no access to a car. It is therefore advanced that the proposal would not result in any material harm to highway and pedestrian safety.



8.0 CONCLUSION

- 8.1 In conclusion, the proposed development would involve the construction of a development of outstanding architectural quality and environmental credentials. Furthermore, sustaining the economy is a vital element of sustainable development, and the latter is about positive growth. Progress has to be made for the betterment of the local economy and social community. Also, the proposal would reduce the reliance on fossil fuels. The proposal would deliver significant socio-economic benefits through the construction process as well delivering a much-needed specialised supported housing.
- 8.2 The site makes the more appropriate and efficient use of previously developed land in an exclusively residential area within the settlement boundary, in a location which has access to a number of local services, facilities and amenities by sustainable transportation modes.
- 8.3 The design has been carefully considered and devised in conjunction with the full knowledge of the constraints of the site. The proposal has been informed and influenced by its location and setting, ensuring that the development is sensitive to the character, form, layout, and scale of the surrounding townscape, whilst taking the opportunity to enhance the setting of the site. The proposal will dramatically improve the character and appearance of the property and result in a building being brought back into full beneficial use. The flats will meet requirement of future occupants, which will have a high level of outlook and provide a good quality of living due to layout and design as a result of the sensitive design approach adopted.
- 8.4 Overall, the proposal represents a sustainable development of outstanding design quality, appropriate to its setting and the character of the wider area, and of exceptional sustainability credentials.
- 8.5 As such, it fully accords with local and national planning policy, which promotes developments which reflect local design policies and guidance, and to



developments of outstanding or innovative design which promote high levels of sustainability and help raise the standard of design in an area, providing they fit in with the overall form and layout of their surroundings.

8.6 The scheme is fully compliant with the suite of local and national planning policies.