

Planning Statement (including Green Infrastructure Statement)

Retrospective Application for the Erection of
4 No. Self-Contained Pods

Neuadd Wen, Penylan Road, Bassaleg,
Newport, NP10 8RW



Contents

1. INTRODUCTION	2
2. SITE AND SURROUNDINGS	3
3. PLANNING HISTORY	4
4. APPLICATION PROPOSALS	7
5. PLANNING POLICY CONSIDERATIONS	8
6. KEY CONSIDERATIONS	11
7. GREEN INFRASTRUCTURE STATEMENT	14
8. SUMMARY AND CONCLUSIONS	15

Planning Potential Ltd
Bristol
Runway East
1 Victoria Street
Bristol BS1 6AA
T: 0117 214 1820

Report Author: Jack Mclean
Report Reviewer: Elliot Jones
Client Contact: Mr and Mrs Ashton
Report Reference:
24/7600

1. INTRODUCTION

- 1.1. This Planning, Design and Access Statement (including Green Infrastructure Statement) has been prepared on behalf of our clients, Mr and Mrs Ashton. It relates to a retrospective application for the erection of four self-contained pods to be used for tourism and employment purposes at Neuadd Wen, Penylan Road, Bassaleg, Newport, NP10 8RW.
- 1.2. The four self-contained pods have been in place since February 2022. They were constructed on the understanding that the erection of the pods would not require planning permission and that the structures were permissible under the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2015. However, following a review of the regulations, it became apparent that planning permission would be required for the pods and the applicant is now seeking to formalise their development on site together with their permitted use.
- 1.3. A previous application for the pods was refused on 23rd November 2022 (App No: 20/1178). The Council's concerns predominantly related to highways matters in terms of the suitability of the current access to accommodate vehicle movements from the proposed development.
- 1.4. Following the refusal of App No: 20/1178, our clients have considered the viability and operational constraints of utilising the pods for a solely tourism use and consider that there is scope for the pods to also be used within Use Classes B1 and D2, which would ensure that the pods to be utilised/occupied without significant impacts in terms of vehicular movements and residential amenity.
- 1.5. A retrospective application was therefore submitted to Newport Council in December 2024 (App No. 25/0015), which was supported a substantive Transport Technical Note to address the Council's highways concerns regarding the development. However, it was subsequently refused in April 2025. The current application seeks to address the reasons for refusal issued by the Council.
- 1.6. In terms of its structure, the Statement will progress as follows:
 - Description of the application site and its surrounding context (Section 2).
 - Summary of the site's planning history (Section 3).
 - Explanation and description of the application proposals (Section 4).
 - Section 5 reviews the relevant planning policy.
 - Section 6 considers the key considerations for the determination of this application; and
 - The conclusions are provided within Section 7

2. SITE AND SURROUNDINGS

- 2.1. Neuadd Wen is located to the north of Penylan Road, Bassaleg.
- 2.2. The application site comprises a three-storey modern residential dwelling, a large, designated parking area, and a substantial body of water that covers the north eastern half of the site. The pods (which are the subject of this retrospective application) are currently located in the eastern part of the site.
- 2.3. The site access to Penylan Road is shared by the applicant and their two neighbours. These two properties; Penylan Cottage and Clearwell Farm, are located to the south and west of the application site. The latter contains agricultural land that stretches to all other boundaries of the site and also includes an access track into the application site. This access track is not the primary access for the Farm.
- 2.4. Penylan Road is a narrow rural lane that extends between Druidstone Road to the south west and The Griffin/Caerphilly Road to the north east. The application site is accessed via a junction on Penylan Road that leads through manual gates to the north. It is understood that Penylan Road is currently subject to a 30mph speed limit as detailed within the Newport City Council (Various Roads, Newport) (30 mph Speed Limit) (No. 2) Order 2025.
- 2.5. The site is not locally or nationally listed nor is it located within a designated Conservation Area. Despite the location of the large pond to the rear of the residential property, the application site is in Flood Zone A and has a less than 0.1% risk of flooding each year. However, a Special Landscape Area is located nearby to the east of the site (0.41km from the eastern boundary) and the site is located near a Scheduled Ancient Monument (0.24km to the South-East).
- 2.6. The site is not located within the settlement boundary of Newport. It is therefore designated as countryside within adopted Newport Local Development Plan (LDP) (January 2015). The site is not covered by any designations in the LDP, although designated local footpaths are located on the western border of the site and to the east of the site whilst a bridleway exists to the southwest of the site.

3. PLANNING HISTORY

3.1. The relevant planning history for the site is summarised below:

- **App No: 25/0015** – *Retrospective application for the erection of 4 No. Self-Contained mixed use B1 and D2 pods* – Application refused April 2025.
- **App No: 20/1178** – *Construction of four self-contained glamping pods for Tourism* - Application refused November 2022.
- **App No: 07/1372** – *Partial discharge of condition 01 (Material) and 02 (Landscaping) of planning permission 06/0154 for the erections of a replacement dwelling* - Application approved December 2007.
- **App No: 06/0154** – *Erection of replacement dwelling* - Application approved April 2006.
- **App No: 05/0927** – *Erection of a replacement dwelling* - Application approved October 2005.
- **App No: 04/1662** – *Erection of three storey extension and installation of dormer windows* - Application refused January 2005.
- **App No: 00/0940** – *Erection of first floor extension over existing garage* - Application approved October 2000.

3.2. Of these submissions, the most relevant are the latest applications for the construction of the self-contained pods.

2020 Application

3.3. The first application was refused in November 2022 (Ref. 20/1178). It sought planning permission for the 4 No. pods albeit solely for tourism purposes.

3.4. Two objections were received on this application from the neighbours of the site (Penylan Cottage and Clearwell Farm). The objections raised related to noise, increased traffic, and that permission was required from a neighbouring landowner to use the easement for commercial purposes. However, further investigation uncovered that this was not the case as the Register of Title for the site states that access is for all purposes is permitted.

3.5. The Council's Highways Department objected to the proposals on the grounds that the submitted vision splays were insufficient and that there was concern that the proposed development would intensify traffic at the access junction. Further, there was some doubt as to whether the vision splays were achievable (particularly the vertical visibility). Given that the applicant did not have control over their management/maintenance as the adopted highway extends over 10 metres down the track, it was considered by the Council's Highways Department that these grounds would render the junction "unsafe".

3.6. Additionally, the concerns raised by the Highways Officer as part of the refusal for App No: 20/1178 highlighted that the proposed development would result in the intensification of traffic movements at the junction leading onto Penylan Road

3.7. It is important to note that the access junction is not a private access and is currently used by the applicant and neighbours on a daily basis. Furthermore, the neighbouring farmer's businesses attract a significant number of non-residential trips that all require use of the junction due to the seasonal ventures at the farm.

3.8. The application was refused for the following reasons:

"01 The proposed development would result in the intensification of traffic movements at the junction leading onto Penylan Road. Insufficient and inaccurate information has been submitted which means that a full and proper assessment cannot be undertaken of the harm relating to highway safety. This would be contrary to policy GP4 (Highways and Accessibility) of the Newport Local Development Plan 2011-2026 (adopted January 2015).

02 Insufficient and inaccurate information has been submitted to enable an assessment of any proposals to improve visibility splays at the junction and the impact that this would have on the visual amenity and character of this countryside location, resulting from the loss of any hedgerows. This would be contrary to policy GP2 (General Amenity) of the Newport Local Development Plan 2011-2026 (adopted January 2015).

03 Insufficient and inaccurate information has been submitted to enable an assessment of any proposals to improve visibility splays at the junction and the impact that this would have on the loss of biodiversity resulting from the loss of any hedgerow. In addition, insufficient information has been submitted to demonstrate that the development would achieve net bio-diversity gain on the site as

required by policy GP5 (Natural Environment) of the Newport Local Development Plan 2011-2026 and paragraph 6.4.5 of Planning Policy Wales (Edition 11)."

- 3.9. That said, the Officer's Delegated Report noted that the site was located in the countryside but that Policy SP5 (Development within the Countryside) was satisfied due to the location of the proposed pods within the residential garden, therefore, the proposals would not result in the loss of a greenfield site.

2025 Application

- 3.10. More recently, a retrospective planning application was submitted to Newport Council in January 2025 (Ref. 25/0015) that sought full planning permission for the development of 4 No. existing pods to be used for tourism and employment uses.
- 3.11. Similarly, the main area of concern related to highway matters. In this instance, the Highways Officer objected to the proposals due to the lack of a submitted Speed Survey as well as considering that visibility splays were insufficient. The applicant sought to refute the comments made by the Officer due to a published notice of intent to remove the existing 20mph speed limit on Penylan Road and replace it with a 30mph speed limit.
- 3.12. The submitted Transport Note and associated visibility splays were therefore based on the above and provided with accurate speed data for the site that addressed both 20mph and 30mph speeds. Additionally, it was considered that the width of the road was significantly narrow and that the road was not suitable for overtaking. As such, the visibility splay submitted with the application was accurate and should be considered acceptable.
- 3.13. In response, the Highways Officer stated on 3rd April 2025:

"For the avoidance of doubt a speed survey was suggested to allow the applicant to show that speeds are below the posted limit. Furthermore, relaxation to a 2m X distance also requires that low traffic flows are demonstrated, and they haven't been, but a survey may help the applicant to establish that (or not).

The standard approach is to accept the speed limit, which is 30 mph. This requires visibility splays of 2.4 x 43m. If these had been demonstrated the objection would not be maintained.

The applicant suggests that the Y distance can be measured to the centre line. This is only the case when it is impossible to travel on the nearside. The road in question is wide enough for vehicles to overtake and there are no constraints to prevent them.

The only relaxation allowed would be to measure the Y distance to a point 1m from the edge of carriageway. It should not be assumed that an overtaking vehicle is a car, but there is adequate space for two cars.

We would welcome a scheme showing the required visibility splays, but at this point must maintain the objection on highway safety grounds."

- 3.14. Unfortunately, the Applicant was unable to submit any response to this comment as the application was subsequently refused by Newport Council on 14th April 2025. As part of the Officer's Delegated Report, the Planning Officer concludes that the proposal was not supported by sufficient evidence to demonstrate the visibility splays were suitable given the context of Penylan Road, nor was the proposal supported by a Green Infrastructure Statement in the Council's preferred format, the application was therefore refused for the following reasons:
- *The proposed development would result in the intensification of traffic movements at the junction leading onto Penylan Road. Insufficient and inaccurate information has been submitted, namely how the visibility splays have been calculated and the absence of a speed survey thereby curtailing the Local Planning Authority's ability to carry out a full and proper assessment to identify harm relating to highway safety. This would be contrary to policy GP4 (Highways and Accessibility) of the Newport Local Development Plan 2011-2026 (adopted January 2015).*
 - *The proposal is not supported by a sufficient Green Infrastructure Statement that demonstrates that the scheme has followed the DECCA framework or the stepwise approach as set out within the Section 6 Duty of Planning Policy Wales (Ed.12) and contrary to the aims of Policy GP5 of the Newport Local Development Plan 2011 - 2026 (Adopted January 2015).*

- 3.15. The current submission will address the above reasons for refusal through the provision of a revised Transport Note and a complete and robust Green Infrastructure Statement that follows the stepwise approach as set out within the Section 6 Duty of Planning Policy Wales (Ed.12).

4. APPLICATION PROPOSALS

- 4.1. This retrospective application seeks full planning permission for the development of 4 No. pods to be used for tourism and employment uses (Use Class B1 and D2). The pods are already in situ and are constructed of a composite wood panelling and measure 9m in length and 4m in width. This size ensures that the units can provide suitable space for the wide variety of tourism and employment uses that will help to boost the rural economy of the area.
- 4.2. For ease of understanding, please see below a brief list of potential uses that our client considers best summarises the potential occupiers of the development:
- Short term tourism accommodation.
 - Art Gallery.
 - Pilates Studio.
 - Office Space.
 - Physiotherapist; and
 - Mental Health Services (counselling/hypnotherapy)
- 4.3. As stated, the pods were erected in February 2022, as it was the applicant's understanding that planning permission was not required for the erection of the pods merely the permitted use. However, they agree that consent is required and hence the submission of this application for the pods as well as their permitted use.
- 4.4. The pods are equipped and installed with the adequate appliances and installations to allow for tourism and employment uses to suitably occupy the spaces. The appliances provided within each of the 4No pods are low energy and include efficient insulation to lower their associated carbon impact. Each pod is currently served by one designated parking space, which is located within the existing hardstanding used by Neuadd Wen. This allows for each individual unit to have their own car parking space. The location of the allocated car parking spaces is to the west of the pods, adjacent to Neuadd Wen.
- 4.5. The current submission is the same as the previous applications (App Nos. 20/1178 and 25/0015) due to the materials, location, scope and scale of the physical development not being altered from the previous application. However, the material difference is the proposed uses of the pods is for both tourism accommodation and a range of office and employment uses.
- 4.6. The benefits of broadening the proposed uses from the previous application will allow for any future occupiers to produce less operational noise and can assist in providing a less labour-intensive development overall. The expansion of proposed uses will also ensure that the development can maintain its viability. Finally, the development will assist in diversifying the rural economy and leading to an economic boost within the local area.

5. PLANNING POLICY CONSIDERATIONS

5.1. This section assesses relevant local policy, national guidance as well as supplementary planning documents.

Adopted Newport Local Development Plan 2011-2026 (January 2015)

- 5.2. Policy SP5 sets out that development in the countryside will only be permitted where the use is appropriate in the countryside, respects the landscape character and biodiversity of the immediate and surrounding area, and is appropriate in scale and design. Housing development, rural diversification, and rural enterprise uses, beyond settlement boundaries, will only be appropriate where they comply with national planning policy. The proposed development aligns with this policy in that it will attract tourists and professionals to the local area.
- 5.3. Support for tourism projects is included in the LDP under Policy CF8, which states that new and improved tourism related developments, including hotel and other visitor accommodation, conference and exhibition facilities, heritage interpretation facilities, rural tourism and activity tourism in the countryside will be permitted, particularly where regeneration objectives will be complemented. In these terms, it is noted that the pod-style development are becoming increasingly popular and desired by end-users.
- 5.4. In Paragraph 9.32, tourism is recognised as an important economic activity in the Newport economy, providing employment through serving the business tourism, leisure tourism and more local recreational sectors. However, care will be needed to ensure that any development complements and does not detract from the characteristics of the area concerned.
- 5.5. Paragraph 9.33 further confirms that in accordance with Planning Policy Wales (PPW), rural enterprise in the countryside will be encouraged where proposals do not impact unacceptably on the local amenity and environment. In developing countryside related development, it will be important to ensure that it is sustainable, resulting in a low impact on the environment and local culture, while helping to generate income and employment.
- 5.6. Policy GP1 states that development proposals should be designed to withstand the predicted changes in the local climate by mitigating future flood risk, minimise energy requirements by design and incorporate low or zero carbon energy sources where possible, and reuse or recycle existing construction materials present on site. The design of the pods to include low energy appliances and efficient insulation to lower their carbon impact, therefore, accords with Policy GP1.
- 5.7. Policy GP2 outlines that development will be permitted where there will not be a significant adverse effect on local amenity, it will not be detrimental to the visual amenities of nearby occupiers or the character and appearance of the surrounding area, an inclusive design is promoted, there is adequate amenity for future occupiers, and it is designed to mitigate crime and anti-social behaviour. Due to the nature and location of the development, it is not considered that there has been any significant adverse effect on local amenity. The location of the pods is within the curtilage of the residential land of Neuadd Wen and the utilisation of larch cladding gable ends and metal roof tiles (provided with wood colouring) allows the development to be in keeping with the immediate surroundings. It is, therefore, considered that the proposed development accords with Policy GP2.
- 5.8. Policy GP4 lays out the requirement that development proposals should provide appropriate access for pedestrians, cyclists and public transport, be accessible by a choice of means of transport, reduce transport noise and air pollution by design, provide adequate car parking and cycle storage, provide suitable and safe access arrangements, ensure that development will not result in traffic generation exceeding the capacity of the highway network. The existing access junction has been assessed by Miles White Transport and has been confirmed to be suitable and safe for access associated with the proposed development. It is considered that the proposed development, therefore, does not need to include any access works and will be in accordance with Policy GP4.
- 5.9. Policy GP6 requires good quality design to be sought after in all forms of development. The aim is to create a safe, accessible, attractive and convenient environment. In considering proposals, all development should be sensitive to the unique qualities of the site and should respond positively to the character of the area, maintain a high level of pedestrian access, connectivity, and minimise noise pollution, and reflect the character of the locality. As stated above, the utilisation of composite wood panelling allows the development to be in keeping with the immediate surroundings and therefore it is considered in accordance with Policy GP6.
- 5.10. With regards to Transport, Policy T4 specifies that development will be required to provide appropriate levels of parking, within defined parking zones, in accordance with adopted parking standards. The proposed development includes 4 No dedicated parking spaces that have been defined using the required standard dimensions of 4.8m x 2.4m due to the site's location within Zone 6 (Deep Rural) of the Newport Parking Standards SPD. It is, therefore, considered that the proposed development accords with Policy T4.

Emerging Newport LDP

- 5.11. It is noted that an emerging Newport LDP Plan is currently being progressed, however, this has not yet progressed to the Deposit stage. A Delivery Agreement Plan was published by Newport City Council in January 2023 that stated the publication of the Deposit Plan would take place between October and December 2024, with formal submission occurring in Many 2025.
- 5.12. As the emerging LDP has not yet reached an advanced stage, this Statement will not consider any emerging policies within the Replacement Local Development Plan. As such, limited weight should be afforded to its policies in the determination of this application.

National Planning Policy

- 5.13. In addition to the adopted Local Development Plan, consideration also needs to be given to guidance at the national level such as Planning Policy Wales (PPW), Future Wales: The National Plan 2040 and the Technical Advice Notes on Design and the Historic Environment. There is also the Wellbeing of the Future Generations (Wales) Act 2015.
- 5.14. In terms of PPW Edition 12, Paragraphs 5.6.10 - 13 states planning authorities should adopt a positive approach to diversification projects in rural areas. Additional small business activities can often be sustainably located on farms and provide additional income streams. Diversification can strengthen the rural economy and bring additional employment and prosperity to communities.
- 5.15. Whilst every effort should be made to locate diversification proposals so they are well-served by public transport, it is recognised that certain diversification proposals will only be accessible by car. While initial consideration should be given to adapting existing rural buildings, the provision of a sensitively designed new building on a working farm within existing farm complexes may be appropriate where a conversion opportunity does not exist.
- 5.16. In terms of sustainable development, it should be recognised that many small rural diversification proposals providing local services will actually reduce the journey length for users who would otherwise need to travel greater distances to access these services. Small rural diversification schemes can also contribute to the viability of a community by providing a focus for community life and hubs of economic activity.

Parking Standards Supplementary Planning Guidance

- 5.17. The Newport City Council Parking Standards Supplementary Planning Guidance (SPG) was adopted in August 2015 and provides detailed parking requirements according to land use and type of development. The underlying rationale for the guidance was to provide sufficient parking to avoid the need for vehicles to park on-street and thereby cause congestion, danger and visual intrusion.
- 5.18. It is noted that the Parking Standards described within the SPG inform the observations made by the Highway Authority at Newport City Council in relation to previous submissions on site.
- 5.19. Defined Parking Zones are provided within the SPG that range from Zone 1 (City Core) to Zone 6 (Deep Rural) and describe how each distinct zone should accommodate parking within new development. The SPG describes Zone 6 (Deep Rural) as follows:

“Scattered individual buildings. Areas with no local facilities within walking distance. Motorised travel is required for all journeys but the most local. Public transport services are very infrequent or beyond walking distance. There is no shortage of land for parking provision within the site but the adjacent highway system offers no opportunities to park cars because of the narrowness of the highway.

Notes relating to parking Zones:

i) References above to ‘public transport’ should be taken to mean bus or train services.

ii) Bus service frequencies above must operate consistently between 7am and 7pm to qualify.

iii) For information on acceptable walking distances refer to the IHT document Guidelines for Journeys on Foot and the DETR advice note Encouraging Walking.

iv) The standard dimensions of car parking spaces are 4.8m x 2.4m. An additional pedestrian access of 900 mm will be required to any dwelling (the footpath may be shared with adjacent dwellings). Where parking spaces about a structure such as a wall, fence or garage, the length of the space must be increased to 5.5 m to alleviate any overhang of the public highway.

v) *Developers are advised to read Appendices 1-6.*

- 5.20. As described above, the proposed development accords with the requirements of the Parking Standards SPG and is, therefore, considered to be acceptable in parking terms.

Summary

- 5.21. Specifically, Policies GP2 (General Amenity), GP4 (Highways and Accessibility), and GP5 (Natural Environment), which formed the three reasons for refusal of planning application ref. 20/1178 have been addressed as part of this application through the submission of a Transport Technical Note produced by Miles White Transport.
- 5.22. This Technical Note has provided significantly robust and clear evidence that the proposed access junction is currently fit for purpose and would not require any works to either the immediate highway, or adjoining hedgerows, to allow for the necessary visibility splays to be achieved. The Technical Note also provides confirmation that the proposed uses of the proposed development will not lead to an unsuitable or significant increase in trip generation.
- 5.23. Additionally, it is considered that the Council have previously concluded, through application ref. 20/1178 that the proposed development accords with all other relevant local and national policy.
- 5.24. It is, therefore, concluded that the retrospective application for the erection of 4No. existing low impact single storey pods accords with all relevant local, national, and emerging planning policies.

6. KEY CONSIDERATIONS

- 6.1. Whilst the pods are located within the Countryside as prescribed by the adopted LDP, Officers at Newport City Council took the view that the proposed pods would be located within a residential garden and would not result in the loss of a greenfield site. The development was also considered to occupy a relatively small portion of the large garden. Additionally, Officers considered that the countryside location would be part of the attraction to the proposed pods.
- 6.2. Officers also considered that the rural setting and outdoor activities could not be achieved in a more urban area. The proposed use would, therefore, not be out of context because Pen-Y-Groes campsite is located approximately 0.1m further along Penylan Road.
- 6.3. The Parking Standards Supplementary Planning Guidance (August 2015) is also relevant and was considered to be satisfied through the previous application.
- 6.4. As such, App No: 20/1178 was considered by Officers to accord with the following LDP policies:
- Policy SP1 (Sustainability).
 - Policy SP5 (Countryside).
 - Policy GP1 (Climate Change).
 - Policy GP3 (Service Infrastructure).
 - Policy GP6 (Quality of Design).
 - Policy T4 (Parking).
 - Policy T5 (Walking and Cycling); and
 - Policy CF8 (Tourism).
- 6.5. It is, therefore, noted that only Policies GP2 (General Amenity), GP4 (Highways and Accessibility), and GP5 (Natural Environment) were referenced within the Council's reasons for refusal.
- 6.6. Officers considered that insufficient and inaccurate information had been submitted which meant that a full and proper assessment of highway considerations was unable to be undertaken relating to safety, impact of the development on the visual amenity and character of the site's countryside location, and the loss of biodiversity resulting from the loss of any hedgerow.
- 6.7. The development of the pods at the application was, therefore, largely considered favourably by the Council in their decision, with the focus of concern, and reasons for refusal, surrounding the access arrangements.

Addressing Previous Reasons for Refusal

Highways Matters

- 6.8. Given the recent refusal of the previous application, an updated Transport Technical Note has been prepared by Miles White Transport and is submitted alongside this Statement. The Technical Note states that the negligible potential increase in traffic levels will not have any adverse effects upon the operational performance or safety record on Penylan Road.
- 6.9. Policy GP2 (General Amenity) has been satisfied, as the submitted Transport Technical Note clearly highlights that the required visibility splays are achievable in both directions and will not require any works to be undertaken to the hedgerows along Penylan Road. As such, it is considered that there will be no impact to the visual amenity or character of this countryside location.
- 6.10. As Policy GP4 relates to Highways and Accessibility, it was important for the Transport Technical Note to robustly address the potential impacts on traffic movements as a result of the use of the proposed pods for tourism and business/offices uses. It states that the proposed uses would potentially generate a maximum of 3 and 5 two-way vehicle movements in the morning and evening peak hours respectively, equalling a maximum of one vehicle every 12 minutes.

- 6.11. Given that the visibility splays available at the existing access junction are considered by Miles White Transport to accord with current highway design guidance, it is not considered that there are any existing highway safety issues that the negligible increase in traffic flows (associated with the development proposals) would have an adverse effect upon.
- 6.12. The Transport Note confirms that the absence of any personal injury accidents on this part of Penylan Road supports the assertion that the visibility at this junction is satisfactory. This junction is used by a neighbouring landowner for various events (such as pumpkin picking during the build up to Halloween, the sale of Christmas Trees in the winter months, and a Maize Maze attraction during summer) throughout the year that generate significantly higher levels of vehicular traffic than that associated with the current development proposals.
- 6.13. The reason for refusal also stated that due to insufficient and inaccurate information considered to have been submitted, the Council was unable to assess whether the proposals will improve visibility splays at the junction and the absence of a speed survey makes the LPA unable to carry out a full and proper assessment to identify harm to public safety.
- 6.14. Following a Traffic Regulation Order in March 2025, Penylan Road is officially subject to a 30mph speed limit. This is a material consideration as it allows the submitted Transport Note to accurately present the required visibility splays for the access junction associated with the proposed development. It has been clearly demonstrated that 1 metre offset has been included from the edge of the carriageway, directly addressing comments from the Highways Officers comments. Additionally, the submitted visibility splays adopts a standard "X" distance of 2.4 metres that was requested by the LPA.
- 6.15. As stated above, the Transport Technical Note states that the required visibility splays are achievable on site without any works being required to the hedgerow on Penylan Road. As such, it is considered that there will be no requirement for the development to provide bio-diversity gain on the site. It is, therefore, considered that the development will accord with the principles of Policy GP5.
- 6.16. The previous reason for refusal within planning application ref. 20/1178 has been adequately addressed through the submission of the Visibility Splay Plan prepared by Miles White Transport. It is clearly shown that the access junction from Penylan Road is appropriate for the style of development proposed, it also clearly demonstrates that the nearby road network will not be adversely impacted by the increased vehicle usage anticipated from the development.
- 6.17. The second reason for refusal relates to the lack of a sufficient Green Infrastructure Statement. Section 7 of this Statement has provided a complete and robust assessment of the proposals in line with the DECCA framework and the stepwise approach as set out within the Section 6 Duty of Planning Policy Wales (Ed.12).
- 6.18. It is, therefore, considered that both reasons for refusal of application ref. 25/0015 have been sufficiently and robustly addressed by the application.

Business and Employment Use of the Pods

- 6.19. Following the refusal of application ref: 20/1178, our clients have considered the viability and operational constraints of utilising the pods for a solely tourism use and consider that there is scope for the pods to also be used within Use Classes B1 and D2, which would ensure that the pods could continue to be utilised/occupied without significant impacts in terms of vehicular movements and residential amenity.
- 6.20. The benefits of broadening the proposed uses from the first application will allow for any future occupiers to continue to produce less operational noise than other commercial-focussed uses and would assist in providing a less labour-intensive development overall. The expansion of proposed uses will also ensure that the development can maintain its viability in line with Paragraph 5.6.12 of PPW Edition 12, that states "*small rural diversification schemes can also contribute to the viability of a community by providing a focus for community life and hubs of economic activity.*". Additionally, the development will assist in diversifying the rural economy and leading to an economic boost within the local area.
- 6.21. In terms of sustainable development, it should be recognised that many small rural diversification proposals providing local services will actually reduce the journey length for users who would otherwise need to travel greater distances to access these services. Small rural diversification schemes can also contribute to the viability of a community by providing a focus for community life and hubs of economic activity.

Other Matters

Noise

- 6.22. The proposed pods are located an appropriate distance from the site boundary and the shortest distance between the pods and the neighbouring property is approximately 20 metres. This significant distance, alongside the use of the proposed pods, are not considered to pertain to a significant adverse impact to the neighbouring amenity.
- 6.23. Additionally, as part of application ref. 20/1178, the Noise and Neighbourhood Team (Environmental Health) confirmed that they do not have any objections to the application and concluded that the development would have minimal environmental effects on the local amenity.
- 6.24. The proposed expansion of uses of the pods is unlikely to produce significantly adverse impacts to the existing noise levels within the area. Due to the size of the pods, utilising the proposed tourism and employment uses will not attract large groups and it is expected that occupiers/users will either be present as individuals or in smaller groups no more than 3 or 4 people.

Biodiversity Net Gain

- 6.25. The Council considered that insufficient information was submitted to demonstrate that the development would achieve net biodiversity gain on the site. As stated above, there will be no requirement for any works to be completed to the existing hedgerows at the vehicle access to the site and it is considered that Biodiversity Net Gain is not relevant to the development proposed through this current application.

7. GREEN INFRASTRUCTURE STATEMENT

- 7.1. PPW Chapter 6 has recently been updated and now requires that relevant applications should be supported by a Green Infrastructure Statement. The Statement should be proportionate to the scale and nature of the development proposed. In the case of minor development, this will include a short description as to how the proposal will incorporate new green infrastructure and demonstrate positive multi-functional outcomes where appropriate.
- 7.2. Paragraph 6.4.15 of the PPW Wales (12th Edition), provides details of the 'Step-Wise' approach that should be adhered to when completing a Green Infrastructure Statement. It states that the first priority for planning authorities is to avoid damage to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
- 7.3. Due to the retrospective nature of the application, the self-contained pods are currently in situ on the application site. The Applicant has confirmed that the pods have been erected with a small elevation above the existing soft landscaping and that no works will need to be completed to the hedgerow located adjacent to the access junction to allow for the required visibility splays to be achieved. As such, the Applicant has sought to minimise and avoid the removal of any green infrastructure through the proposals.
- 7.4. In addition, the proposed parking facilities associated with the use of the proposed pods will be located on existing hardstanding to the front of the residential property. As such, the proposals have satisfied paragraph 6.4.15 of the 'Step-Wise' approach by avoiding damage to biodiversity in its widest sense.
- 7.5. Given the nature of the proposed development at the Neuadd Wen, the scope for new green infrastructure is relatively limited. As such, it would be expected that the proposed pods will improve the socio-economic conditions in this part of Bassaleg. It will create new locations for tourism and employment uses that are situated in a sustainable location and will benefit the local community and visitors alike.
- 7.6. Moreover, the retrospective development has been designed using sustainable materials and is located entirely within the curtilage of Neuadd Wen. It is considered that this is a sustainable approach to development and will not have any negative impacts on the wider countryside location.

8. SUMMARY AND CONCLUSIONS

- 8.1. It is considered that this Statement conveys the planning principles that have informed the proposal.
- 8.2. The level of information and investigation in this Statement is proportionate to the retrospective nature of the proposed pods at Neuadd Wen. The site's location within the defined countryside is considered to comply with Policy SP5 due to the neighbouring Pen-Y-Gros campsite located approximately 0.1km along Penylan Road.
- 8.3. This application follows refusals under ref. 20/1178 and 25/0015 for identical built development, however, the current proposals slightly expand the potential uses of the pods from ref. 20/178 to tourism and employment uses, albeit this was the same approach adopted in 2025 submission
- 8.4. The reasons for refusal attached to application ref. 25/0015 have been clearly and robustly address in this submission .
- 8.5. The previous application was objected to by the Highways Officer and subsequently refused on these grounds. It is considered that the objections made by the Highways Department have been clearly and robustly addressed through the submission of the robust visibility splays and the preparation of a Transport Note that demonstrates that the required visibility splays are achievable in both directions and do not affect the hedgerows along Penylan Road in any way. The Transport Note also concludes that there will be a negligible potential increase in traffic levels and will not have any adverse effects upon the operational performance or safety record on Penylan Road.
- 8.6. The previous application was also refused on the grounds of an insufficient Green Infrastructure Statement . It is considered that this reason for refusal has been sufficiently addressed with the current Green Infrastructure Statement confirming that damage to biodiversity has been avoided through the location of parking facilities and the design approach of the pods. It is, therefore, considered that this approach has followed the 'Step-Wise' approach as set out within the Section 6 Duty of Planning Policy Wales (Ed.12).
- 8.7. The proposal is, therefore, considered to comply with the Local Development Plan as well as national guidance and adopted supplementary planning documents.