

Design & Planning Justification Statement (Revised)

**Application site to the rear of the Post Office, 34 Caerphilly Road, Bassaleg,
NP10 8LE and adjoining 'Mill Lane' to the rear.**

**Change of use of land to the rear of the above property to allow for a new infill
bungalow fronting Laurel Drive.**

540 – March 2024

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1.0 **BACKGROUND**

1.1 This Full Planning Application Submission (reference 1.2 below) includes the following documentation and which requires to be fully considered and included as part of this submission:

- .1 Pre-Application Statement, Version 2, dated December 2023. (Document 1.1.1);
- .2 Newport City Council Local Planning Authority's (NCC LPA's) PRELET/P/24/0001 letter issued as an attachment to their email dated 2nd May 2024. (Document 1.1.2);
- .3 Follow-up Pre-Application Submission, Version 1, dated July 2024. (Document 1.1.3);
- .4 Key email correspondence covering the above. (Documentation 1.1.4).

1.2 Document 1.1.3 above was submitted into NCC LPA in response to Document 1.1.2 but has not yet been considered for the reasons cited under their emails dated 6th and the 29th September 2024. (Documentation 1.1.4). Such emails also confirm that the Applicant can submit Document 1.1.3 addressing concerns expressed under their Document 1.1.2 as part of a Full Planning Application submission as opposed to a further follow-up Pre-App. The Applicant has opted to go down this route and Full Planning Application (24/0946) was submitted on the 21st November 2024 and validated on the 22nd November 2024. The Applicant was advised that the proposals were 'too big' and that previous dwgs. nos. 540-P-04 & 540-P-06 accompanying Document 1.1.3 were considered to be much more appropriate. As a result, the Applicant withdrew Full Planning Application 24/0946 on the 9th January 2025. A 'free-go' Full Planning is now being made (resubmitted within 12 months of the previous withdrawn Full Planning Application) and revised drawings and this revised and up-dated Design & Planning Justification Statement dated March 2025 supersedes the previous one dated November 2024. ALL ITEMS MARKED IN 'YELLOW' HIGHLIGHT THE AMENDMENTS/ADDITIONS BETWEEN THE 2 JUSTIFICATION STATEMENTS WHEREIN THE REFERENCES TO 'DORMER BUNGALOW' HAVE BEEN ALTERED TO 'BUNGALOW' ONLY IE THE PREVIOUS DORMER WINDOWS HAVE BEEN OMITTED TO REDUCE SCALE AND MASS MAKING THE NEW PROPOSALS 'LESS BIG'.

2.0 **DESIGN AND PLANNING JUSTIFICATION**

2.1 The Full Planning Application Submission takes account of the following key issues raised under Document 1.1.2:

2.2 **HIGHWAYS MATTERS:**

- .1 Highways accept that the new application site will not be any worse than the existing situation and therefore not grounds for formal objection. 'Mill Lane' is also classified as a restricted byway as opposed to an adopted highway.
- .2 Drwg. 540-PA-01 addresses vehicular/pedestrian visibility and safety matters based on previous planning applications in this locality (eg 13/0263) requiring 900mm set-backs and 45 degree visibility splay criteria and believed to be acceptable 'current standards' in the absence of any Highways confirmation in this respect.
- .3 Existing and new dwellings provide two bedroom accommodation requiring no more than 2 car parking spaces each and as illustrated on drwg. 540-PA-04.

- .4 The application site illustrates new cycle storage provision as illustrated on drwg. no. 540-PA-04. No. 34 Caerphilly Road can easily accommodate similar cycle storage provision.
- .5 Refuse storage appertaining to the application site is as illustrated on drwg. no. 540-PA-04 and which can be easily taken out onto the Laurel Drive public footpath for collection via the proposed new gated access/egress. The existing No. 34 Caerphilly Road flat refuse is currently stored within its grounds out of public view and taken out onto the Caerphilly Road public footpath for collection.
- .6 The submitted Pre-App car parking arrangements for the existing 2 bedroom flat take account of 45 degree/900mm depth of visibility splays and have been altered to be set out as a row of tandem parking to provide more depth of garden space at the rear of the proposed new bungalow.
- .7 The Applicant has undertaken land ownership investigations and discovered that the area of 'verge land' backing the Laurel Drive footpath is within legal ownership and provides extra car parking space to the new dwelling car parking frontage. This allows a new proposed brick wall to extend onto the adjacent existing bungalows' brick walling fronting Laurel Drive and which NCC LPA have advocated.
- .8 Any requirement for a Construction Management Plan should be able to be covered by way of a Planning Condition as opposed to having to produce one at the submission stage. (Based on previous planning application submissions).
- .9 Hopefully Highways will now accept the above as having addressed their raised matters and as being more acceptable.

2.3 WASTE DISPOSAL:

- .1 Drwg. no. 540-PA-04 indicates the location of the refuse storage area for the application site which can accommodate 1 x 120 litre residual bin, kerbside boxes for recycling and 1 x 240 litre wheelie bin for garden waste confirmed under 1.1.2. They are located next to the proposed new pedestrian access/egress gate with short access to the public pedestrian footpath from where they would be collected.

2.4 ECOLOGY:

- .1 Document 1.1.2 stipulates the possible presence of bats associated with the garage and which is due for demolition. A bat scoping exercise report undertaken by a professional Consultant Ecologist to assess the presence/evidence of bat residences eg droppings, urine staining, dead bat carcasses, prey (moth wings, etc) may be required. The period this is required to be undertaken can take place all year around and as such the application should be able to be registered first ahead of the possible need for such a report. Mitigation measures such as bat boxes and bird boxes are provided for as illustrated on drwg. no. 520-PA-05.
- .2 Should evidence be found of bat presence then a further bat dusk emergence/dawn swarming survey may be required by a professional Consultant Ecologist which can only take place from the beginning of May until the end of September.

2.5 DRAINAGE:

- .1 Document 1.1.2 confirms that NCC LPA will consult Dwr Cymru Welsh Water (DCWW) and they will comment on and assess any construction area in relation to Sustainable Drainage System (SuDS) to manage on-site surface water. In the legislation for sustainable drainage, the definition of '**construction work**' is ...'anything done by way of, in connection with or in preparation for the creation of a building or other structure and has **drainage implications** if the **building or structure** will affect the ability of the land to absorb rainwater'. **Construction area** is generally defined in the regulations for sustainable drainage as the construction area of a **building or other structure** covering an area of land of **100m² or more**. The proposed new bungalow footprint (**classed as the building area**) has an area of 60m² and which is less than the 100m² allowance. All other areas such as the car parking, patios, footpaths, etc., are specified as gravel finish which can be classed as rainwater self-draining and not classified as building or structure requiring SuDS assessment and analysis. Discharge of the proposed bungalow roof area is via an on-site soakaway as illustrated on drwg. no. **540-PA-04**.

2.6 AMENITY SPACE:

- .1 In terms of private outdoor amenity space, NCC LPA's website includes a Supplementary Planning Guidance (SPG) for New Dwellings (dated January 2020) regarding which paragraph 5.2.1 thereunder stipulates that such provision for a 2 bedroom+ bungalow should provide an area of 1m² for every 1m² of proposed footprint ... in this case 60m². (Not including the frontage vehicular parking spaces/driveways).
- .2 The above SPG does not include any reference to 'bungalows or houses' gross internal floor space ... only 'flats'. As a consequence, reference within Document 1.1.2 to a 2 bedroom dwelling being of **83m²** floor space, is ambiguous - particularly as under Appendix B of the 'Welsh Development Quality Requirements 2021' dated July 2021 (WDQR 2021), a gross internal floor (GIA) area of 58m² is quoted for a 3 person 2 bedroom 'bungalow'. (GIA is measured to the internal finished surfaces of main containing walls on each floor). Also: 83m² does appear within the former SPG for New Dwellings dated February 2019, paragraph 5.5.2, for a 'house' type with 2 bedrooms – but this has been superseded by the January 2020 edition that needs to be updated to clarify all of this.
- .3 As it stands the proposed GIA for the proposed new bungalow is 81m².
- .4 NCC LPA have referred to the fact that rear gardens should extend at least 10m² from the rear elevation of a house. In this case, it is a bungalow as opposed to a house. This criteria is more related to privacy and the provision of rooflights do not provide direct overlooking issues associated with the adjacent No. 12 Laurel Drive. (Reference drwg. no. 540-PA-05). Further, there are not believed to be any 'habitable' rooms running along the northern elevation of No. 12 Laurel Drive which would be directly overlooked from the proposed new bungalow southern elevation – particularly running along the ground floor which has a 1800mm high solid timber fence obstructing any overlooking views. No windows look directly into any other 'protected' neighbouring windows. No. 2 Church Crescent has a side window at first floor level but this is merely a staircase window. Its ground floor side window is a

single kitchen window. Both classed as 'unprotected'. The length of the side garden measures a minimum 7.5 metres from the side elevation and has not been extended further so as to reduce any perceived overlooking privacy issues directly into any No. 12 Laurel Drive eastern elevation habitable room zones. The above has been formulated in recognition of NCC LPA's requirement within their Document 1.1.2 that dwellings need to be designed to avoid undue loss of privacy for neighbours.

- .5 There have been previous planning applications that NCC LPA have objected to the amount of amenity space allocation provided but which has been rejected upon appeal with NCC LPA's amenity requirements being considered to be no more than guidance and should not be treated as prescriptive. (PA 21/0053, Appeal Ref CAS-01956 for example). In the case of bungalows, smaller external garden spaces are more favoured by people compared with larger ones.

2.7 OVERDEVELOPMENT OF LAND – 1.1.2 PRE-APP ISSUES/CONSIDERATIONS: (**Bold text hereunder** refers to NCC LPA comments provided under Document 1.1.2)

- .1 **The proposed Pre-App 2-storey house concept is considered by NCC LPA not to sit happily within the street environment and a more simple design is suggested that takes account of the existing Laurel Drive bungalows with their roof designs and gables facing Laurel Drive. (The Cornish 2-storey houses facing Church Crescent are deemed to be separated by Mill Lane and not as dominant as the existing bungalows). Document 1.1.2 states that ... 'Whilst the scale and appearance between the (existing) bungalows and semi-detached dwellings (existing Cornish houses) are clearly different, they share the same pattern of development providing a consistent building line and a strong frontage. It is strongly recommended that the proposed dwelling should be reduced to become a bungalow.**

Whilst Document 1.1.3 provides counter-arguments in terms of a 'corner/infill plot concept' etc., the latest proposals endeavour to take on board the above comments and has changed from a 2-storey house to that of a more 'simpler designed' scaled-down bungalow concept whose appearance is much more in-keeping with the adjacent existing Laurel Drive Bungalows adopting a primary dual-pitched single storey roof and a gable frontage facing Laurel Drive matching the frontage gable features of the existing bungalows. This enhances NCC LPA's acceptance that the proposed new bungalow design shares the same pattern of development as that of the adjacent Laurel Drive bungalows – providing a consistent building line and strong frontage. So any such features that link the two developments and surrounding area in with one another must be viewed as acceptable.

- .2 **Document 1.1.2 is critical of the fact that the proposed Document 1.1.1 2-storey house is set back further from the road compared with near-by properties and orientated at an angle converse with its nearby neighbour to the south – disrupting the pattern of development in Laurel Drive and appearing incongruous in the road due to its siting and orientation.**

Document 1.1.3 **previously provided** counter-arguments to the above.

Setting any proposed dwelling as far back as possible (as opposed to bringing it more forward) and orientating it at an angle impacts far less on the existing adjacent

bungalow No. 12 Laurel Drive and arguably counters **any** 'not sitting happily' issues. The existing bungalows also are made up of semi-detached, dual-pitched, gable ended frontage design with a flat roof side attachment which acts to separate the new dwelling more and thereby makes it less significant. Setting the new dwelling further back also provides a better connection with the rear garden return of the L-shaped corner plot in that the lounge window views more into the rear garden and makes a much better amenity/linking connection. Should all of this be acknowledged then less emphasis could be placed on the house elevation facing Church Crescent/Laurel Road/Laurel Drive but could still reflect local features such as the existing bungalows gable ends, **brickwork** side return and render finishes and which the proposed drawings take on board **fully**. The existing bungalow designs cannot be matched exactly as they are semi-detached and not detached but their design concepts have been reflected – albeit not fully but which is understandable.

The setting out and orientation of the proposed dwelling occupies not only the existing double garage space footprint (to be demolished) but also the footprint of the former two-storey Abattoir and has arguably more planning justification. Both existing structures are significant key planning elements and their being set-out at the orientated angle should be fully acknowledged and accepted as a fundamental planning concept. If conversion or extension of the double garage is proposed then surely this would not be a planning issue. Further, **the proposed layout utilises the existing re-cycled boundary stonework and which NCC LPA wanted retained and incorporated into the design. This also applies to the extenuation of the existing bungalows' smooth brick walling fronting Laurel Drive and which NCC LPA cite as adding 'further strength' to this frontage. The proposed layout drawings take all of the above into account albeit that where visibility splays occur a height of 600mm is stipulated by Highways and the existing boundary walling has been adapted to provide safer pedestrian/vehicular viewing.**

Taking into account all of the above, there's an argument for suggesting the application site as being more of a 'stand-alone, set-back, corner, infill plot' separating the two existing development types either side separated by Mill Lane which has other multiple existing structures off it. **That said, the proposals do take account of what the Planners advocate and that is to integrate as best as possible with the adjacent Laurel Drive bungalows and which they are deemed to do.**

.3 Document 1.1.2 states that the site is situated within Laurel Drive and reads 'very much' as being part of Laurel Drive.

The car parking is actually *accessed off the unadopted byway* (not officially named but referred to locally as 'Mill Lane') and which in itself is accessed off Church Crescent (as opposed to Laurel Drive as assumed) by reference to the existing on-site road junction markings and the Ordnance Survey Plans.

3.0 SUMMARY

3.1 Drwg. no. 540-PA-05 summarises the setting out and design of the bungalow concept adopted for the application site as follows:

'The proposed new bungalow design comprises single storey eaves heights to match the scale of the adjacent single storey Laurel Drive bungalows. The existing stone boundary

walling has been retained but part demolished and reduced to a height of 600mm to provide more safer highways visibility splay lines. The new bungalow walling is finished with facing brickwork and silicone rendering to match the appearance of the adjacent existing bungalows together with the new flat roof canopy porch main entrance feature to match the flat roofing extensions of the existing bungalows. The new bungalow orientation has been set out to fit the existing site constraints and to closely match that of the existing bungalows and the near-by Cornish dwellinghouses together with the existing garage. (To be demolished). Roof material finishes match those of the existing bungalows. The new bungalow external footprint area is 60m² and this represents the area of the side/rear garden amenity space in full compliance with planning requirements. The use of sloping rooflights (as opposed to projecting dormer window features) reduces scale and volume issues and reflects more the design of the adjacent existing bungalows. Bat and bird mitigation boxes provided'.

- 3.2 By opting to withdraw Full Planning Application Submission 24/0946 (following Planners' feed-back that the 'dormer' bungalow proposals were considered 'too big' and that dwrgs. nos. 540-P-04 & 540-P-06 (as previously submitted under Document 1.1.3) are deemed more acceptable), then this revised Design & Planning Justification Statement, revised dwrgs. nos. 540-PA-04, 540-PA-05 & 540-PA-06 and taking into account other relevant counter-arguments cited under Document 1.1.3 should now receive approval.