

Dear Ben,

Following the recent consultation responses, we would like to propose the following as a pragmatic way forward.

We have addressed both the Highway Response dated **22 December 2025** and the subsequent comments provided by Highways in **Ben Webster's email to Buchan Rum Architects on 5 February 2026**. Our consolidated response below covers all points raised across both pieces of correspondence.

The Highway comments focus on three principal areas:

1. Clarification of the proposed use
2. Staff numbers
3. Sustainability assessment

Please find our detailed responses to each of these matters below, demonstrating how the scheme fully addresses the issues raised by Highways.

1. Clarification of Proposed Use

On the Proposed Use

In the Highway Response dated 22 December 2025, Highways stated:

"The current application again includes residential development... Furthermore, the units appear to be a HMO. As such, they would require five parking spaces regardless of sustainability credentials."

In the further comments issued via email on 5 February 2026, Highways reiterated this position, noting:

"It appears to be a HMO to me. I can accept that it may be limited to staff, but it is not normal staff facilities."

For clarity, the first-floor accommodation forms ancillary staff support space that is functionally and operationally linked to the lawful use of the meditation centre. It does not constitute a separate planning unit and therefore does not fall within Use Class C3 (dwellinghouse) or C4 (HMO). The rooms are not self-contained, not capable of independent occupation, do **not** contain kitchens or private living facilities and are not **rented, let, or used as private living accommodation. They are** not available for private residential use. The proposed rooms are required solely for **operational reasons**, such as staff shift patterns security, and overnight presence and are only available to staff engaged in the operation of the meditation centre

As such, the accommodation is correctly categorised as ancillary to the primary F1 community use, inheriting the use class of the main facility. This means residential parking standards and HMO-related assumptions do not apply, and the accommodation does not generate independent trip demand.

*It is **functionally linked** to the main use and cannot operate independently. Required only for operational reasons (shift patterns)*

Therefore, the correct planning interpretation is:

Use Class: Ancillary to the main D1/F1 (or equivalent) community/assembly use

This aligns with how councils typically assess these proposals and goes with long-established planning treatment of:

- *Caretaker's rooms*
- *Staff sleep-in rooms*
- *On-call accommodation*
- *Religious/community centre staff rooms*

*These are consistently treated as **ancillary**, not as independent residential units.*

*This classification reinforces our position that **no separate planning unit is created** by this application. The accommodation cannot operate independently, has **no separate access or curtilage**, is **wholly dependent on the main lawful use**, and exists **solely to support the functioning of the meditation centre**. Accordingly, no change of use is triggered, and the accommodation **inherits the use class of the main building**.*

*To provide absolute clarity and fully address the Highway Authority's concerns, the applicant is willing to accept a condition restricting the use of the rooms to **ancillary staff accommodation only**.*

Proposed Planning Condition – Ancillary Staff Accommodation

"The first-floor rooms identified on the approved plans shall be used solely as ancillary staff accommodation in connection with the operation of the meditation centre and shall not be used as a self-contained residential unit, House in Multiple Occupation (HMO), or for any other form of independent residential occupation. The accommodation shall not be let, leased, or occupied by any person other than staff engaged in the operation of the centre."

Reason: To ensure the accommodation remains ancillary to the primary use of the site and to prevent the creation of an independent residential use not assessed as part of this application."

2. Staff Numbers; Clarification

There appears to be a misunderstanding regarding the number of staff who would be required to use the proposed rooms, specifically whether this is two or four and, as a result, the comments on staffing levels and room provision have been characterised as disproportionate.

*In the Highway Response dated **22 December 2025**, Highways stated:*

"It appears from the information submitted that four units are proposed for two staff. Whilst combining work and home locations is generally positive in terms of reducing car use,, and the number of units does not correlate with the number of staff."

*In the further comments issued via email on **5 February 2026**, Highways reiterated this position, noting:*

- "1. disproportionate to the number of staff, so makes no sense as staff facilities.*
- 2. The comments do not appear to support the number of units. There is no need for these numbers. We typically see rooms for staff in care establishments. They are always proportionate to the number of staff on nights. Whoever is on duty uses the same facility."*

To confirm that access to the first-floor staff facilities will be strictly limited to staff members who are scheduled to work on that specific day. To clarify, at any given time, at least **two staff members** are required on site to support the centre's operations. However, due to shift patterns and handovers, there will be occasions where up to **four staff** are present during changeovers and rest periods. Each staff member is allocated a dedicated accommodation room, ensuring that no temporary or ad hoc arrangements are necessary.

This operational model is comparable to staffing arrangements in care homes and similar facilities, where early-morning preparation and late-evening closing activities necessitate an overnight staff presence. The meditation centre operates during early and late hours, with associated changeovers and rest periods, and therefore requires **between two and four staff members** to stay overnight in order to prepare the centre for the following day and to complete cleaning and setup before operations commence.

In addition, the centre will periodically host specialist meditation staff visiting from London and other parts of the country for specific sessions. These individuals will also require on-site accommodation during their stay. However, we confirm that **no more than four staff members will be accommodated overnight at any one time**. To support this operational requirement, a minimum of **four rooms**, as shown on the submitted floor plans, is necessary as **ancillary Staff Accommodation**.

For clarity, the following conditions will apply:

1. The facilities will only be available to staff during their designated working hours and not outside of those times.
2. Staff will not be permitted to leave personal belongings at the meditation centre, with the exception of an overnight bag where necessary.
3. There will be no tenancy agreements or rental agreements in place.
4. There will be no separate postal address associated with the space.
5. There will be no separate entrance to the premises.
6. There will be no separate utility meters.
7. There will be no separate council tax registration.

Please let me know if you require any further clarification.

3. Sustainability assessment

*In the Highway Response dated **22 December 2025**, Highways stated:*

"A sustainability assessment has been completed and claims a reduction for the meditation centre. However, this is based on accessibility to services that relate to residential development not this development. Whilst the SPG is not explicit it is clearly not relevant to have a school or GP (for example) near a meditation facility"

In the further comments issued via email on 5 February 2026, Highways reiterated this position, noting:

“4. There is no demonstration of reduced trips or parking demand. They have simply shown that the development is near facilities that do not relate to its use, unless there is a residential element-which the deny”

In response to the Highways Officer’s comments, the sustainability scoring has been revised to remove residential-specific facilities (school and GP) and to focus instead on community-relevant facilities and services appropriate to a meditation centre. On this basis, the development still achieves 9 sustainability points and therefore qualifies for a 20% reduction in parking provision in accordance with the Sustainable Travel SPG.

Revised sustainability score & parking reduction calculation

Site: Meditation Centre, Blue Cross Rehoming Centre, Willenhall Street, Newport NP19 0GE

In accordance with Newport City Council’s Sustainable Travel SPG, the site has been reassessed using **walking distances** from the Meditation Centre entrance, focusing on facilities and services relevant to a **non-residential community use** (rather than residential-specific criteria such as schools and GP surgeries). Distances have been measured using online mapping tools and rounded to the nearest 50–100m band. The SPG does not contain a specific category for meditation centres. The closest comparable use is indeed a **community/assembly use**, which is consistent with the centre’s lawful use class (F1)

The development achieves a total score of **9 sustainability points**.

1. Local and community facilities

Rule (SPG): Two facilities within the same walking-distance band score that band’s points (200m = 3 points, 400m = 2 points, 800m = 1 point). Access to a District Centre scores double points for that band.

Nearest relevant facilities (approximate walking distances):

- **Foodstore / convenience store (Maindee local shops)** – c. 250–300m
- **Post Office (Maindee Post Office, Chepstow Road)** – c. 350–450m
- **District Centre (Maindee District Centre – Maindee Square / Chepstow Road)** – c. 550–700m
- **Library (Maindee Library, Chepstow Road)** – c. 550–700m
- **Community facilities / places of worship (Maindee area)** – within c. 600–800m

These are all facilities that visitors to a meditation centre can realistically combine with their trip (linked trips) and are therefore directly relevant to a non-residential community use.

Scoring option adopted (non-residential focus):

- District Centre within ≤800m → **2 points (double points at this band)**
- Foodstore / convenience store within ≤400m → **2 points**
- Library / community facility within ≤800m → **1 point**

Local & community facilities score: 5 points

(Note: school and GP surgery, while present within similar distances, are not relied upon for scoring, in recognition of the Highways Officer's comment that these are primarily residential-related services.)

2. Public transport – access to stop

Rule (SPG): 300m = 3 points, 400m = 2 points, 800m = 1 point.

- Nearest bus stops on Chepstow Road are approximately **130–150m** walking distance from the site, well within the 300m band.

Score: 3 points

3. Public transport – frequency

Rule (SPG): 5-minute service = 3 points 10-minute service = 2 points 20-minute service = 1 point
Deduct 1 point if not consistently operating 07:00–19:00.

Bus services along Chepstow Road (including Newport Bus services such as Route 6 via Maindee) operate throughout the day, with typical daytime frequencies of around **10–20 minutes** between Newport city centre, Maindee and Newport Retail Park, and operating within the 07:00–19:00 period on weekdays.

To remain conservative and consistent with the original assessment, frequency is scored at the **20-minute band**.

Score: 1 point

4. Cycle route – proximity

Rule (SPG): Within 200m of a signed cycle route = 1 point.

National Cycle Route 4 runs to the south of the site but is beyond 200m walking distance; access is via local streets and footways rather than a direct frontage.

Score: 0 points

5. Pedestrian and active travel environment (descriptive support)

The site is located within an established urban area with:

- Continuous footways along Willenhall Street and connecting to Chepstow Road
- Dropped kerbs and crossing points on key desire lines
- Street lighting along the walking routes to local facilities and bus stops

While this does not attract a separate numeric score under the SPG, it supports the conclusion that the site is highly accessible on foot and by public transport.

Total sustainability score

- Local & community facilities: **5 points**
- Public transport stop within ~300m: **3 points**
- Bus frequency (10–20 min, 07:00–19:00): **1 point**
- Cycle route within 200m: **0 points**

Total: 5 + 3 + 1 + 0 = 9 points

Parking reduction thresholds (all other development types)

SPG thresholds:

- 10 points → 30% reduction
- 7 points → 20% reduction
- 5 points → 10% reduction

With **9 points**, the development sits between the 7-point and 10-point thresholds and therefore qualifies for a **20% parking reduction** under the SPG.

Parking requirement calculation

- Standard requirement as established under original application (Total floor area: 190 m²) • Parking standard: 1 space per 10 m² (Commercial Assembly) • Required spaces: 190÷10=19): **19 spaces**
- Reduction applicable: **20%**

19×0.20=3.8 spaces→rounded down to 3 spaces

Adjusted parking requirement:

19–3=16 spaces

Conclusion and response to Highways Officer

This updated assessment:

- **Removes reliance on residential-specific facilities** (school and GP) for scoring
- **Uses only facilities relevant to a non-residential community use** (district centre, foodstore, Post Office, library, community facilities)
- **Retains a robust sustainability score of 9 points**, placing the development in the band for a **20% parking reduction**

There are currently **21 parking spaces** available on site, which is sufficient to support the centre's operational needs when assessed against the above calculation. Even if **4 spaces** were allocated to the ancillary staff accommodation, the remaining **17 spaces** would continue to meet the operational parking requirement for the centre.

Nevertheless, to ensure the proposal can move forward and to fully resolve the Highway Authority's concerns, the applicant is prepared to accept the condition proposed below for absolute clarity.

Proposed Planning Condition – Parking (Maximum 17 Public Spaces)

“No more than 17 of the on-site parking spaces shall be made available for public use at any one time. The remaining spaces shall be retained for staff accommodation and operational use associated with the meditation centre and shall not be used by visitors or the general public.

Reason: To ensure that parking demand associated with the development remains within the capacity of the site and to prevent overspill parking on the surrounding highway network, in the interests of highway safety and the free flow of traffic.”

The proposed conditions are reasonable and proportionate to the scale and nature of the development. Restricting the first-floor rooms to ancillary staff accommodation ensures that no independent residential or HMO use can arise, directly addressing the Highway Authority’s concern regarding unassessed residential trip generation. Likewise, limiting public use of the parking area to a maximum of 16 spaces at any one time provides a clear and enforceable mechanism to ensure that parking demand remains within the capacity of the site and prevents overspill onto the surrounding highway network. Together with the previously proposed operational controls such as pre-booked sessions and a one-hour changeover period these conditions comprehensively address the matters raised in the consultation response and provide certainty for all parties moving forward.

The Highway Authority also queried whether the centre is currently operational. For clarity, due to the absence of ancillary staff accommodation, the centre is not yet operating as intended, and sessions are therefore not being held in the planned format. The proposed accommodation is essential to enable the centre to function safely and effectively in accordance with its approved use.

We trust that these conditions satisfactorily resolve both the highways-related matters and the concerns regarding the nature of the accommodation, allowing the application to progress without the need for further debate on these points.

We would welcome confirmation as to whether the above approach would be acceptable.

Kindest regards,
Emma & Emily