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fao. Development Management
address. Civic Centre,
Godfrey Rd,
Newport
NP20 4UR

Dear Sir / Madam

Greenfields Nursery, 198 Tregwilym Road, Rogerstone
Intensification of Use of Children's Nursery

1. Introduction

On behalf of the Applicants, Greenfields Nursery, please find enclosed an application relating to the following development proposal for the above site:

"Intensification of Use of Children's Nursery Increasing Number of Children Being Cared for From 53 to 71 and amendments to parking area layout".

This letter provides an overview of the following matters in relation to the site / proposals:

- Site Context;
- Planning Policy Context;
- Proposed Development;
- Key Considerations; and
- Summary and Conclusion.

In addition to this letter, the following documents are submitted in support of this submission:

- Planning Application Forms; and
- Plans and Drawings - including:
 - Site Location Plan;
 - Parking Provision Plan (Acstro) (Ref. 1087-007 Rev D);
 - Highways Technical Note (Acstro) (Ref. 1087-ACS-ZZ-XX-RP-T-301-A); and
 - Completed Lease (signed by NCC) dated 29th May 2026.

2. Site Context

This planning application relates to the property 198 Tregwilym Road, Greenfields Nursery, which was converted for use as a childcare facility in 1989. The nursery currently has permission to care for a maximum amount of 53 children, ranging from babies to 12-year olds.

The map extract plan below shows the application site within the wider context, which is outlined in red:



Aerial View of Site Location (Indicated in Red)

As demonstrated by the aerial image above, there are a variety of uses within the surrounding area, including residential dwellings and business units at Wern Trading Estate to the north.

The site is located within a sustainable location, in close proximity to alternative transport links and a range of services and facilities. In terms of public transport provision, the nearest bus stops are located on Tregwilym Road, to the south. A number of regular services operate at these stops, which provide access to Newport, Blackwood and Rogerstone and beyond.

Access to the site is currently provided from a lane off Tregwilym Road, which also provides access to the rear of a number of properties along Tregwilym Road. There are currently a total of 15 parking spaces which support the Nursery. They have also historically used and had a right of access over the turning circle, which is adjacent to the premises.

Planning History

The planning history (obtained from the LPA's on-line search facility) which relates to the property is outlined / summarised below:

Reference	Location	Proposed Development	Decision
24/0552	198 Tregwilym Road	Intensification of use of children's nursery increasing number of children being cared for from 53 to 71 and amendments to parking area layout	Refused 06/11/2025 –
CAS-01814-Z2M0Z7	198 Tregwilym Road	Intensification of use of children's nursery increasing number of children being cared for from 42no. to 53no.	Appeal Allowed 14/02/2023 –
20/0338	198 Tregwilym Road	Intensification of use of children's nursery increasing number of children being cared for from 42no. to 53no.	Refused 13/01/2022 –
18/0622	198 Tregwilym Road	Intensification of use of children's nursery increasing number of children being cared for from 42 to 59	Refused 11/10/2018 –

17/0954	198 Tregwilym Road	Intensification of use of children's nursery increasing number of children being cared for from 42 to 59 (resubmission following refusal of 16/582)	Refused 23/11/2017	–
16/0582	198 Tregwilym Road	Intensification of use of children's nursery increasing number of children being cared for from 42 to 59	Refused 19/12/2016	–
95/0022	198 Tregwilym Road	Increase in number of children from 36-42 to allow for a group of six babies	Approved 22/06/1995	–
93/1113	198 Tregwilym Road	Additional group of six babies only (amendment to planning permission 93/0528/VC) increase from 30 to 36 children	Appeal allowed 06/05/1994	–
93/0528	198 Tregwilym Road	Variation of condition increasing the permitted number of children under five years by 17 from 30 to 47 in total	Part allowed / part dismissed 06/08/1993	–
92/1027	198 Tregwilym Road	Change of use of remainder of domestic dwelling to afterschool and holiday care for over 5-year olds (additional 32 children) and an increase from 25 to 28 for existing nursery	Appeal allowed 15/01/1993	–
89/0129	198 Tregwilym Road	Use of a house as a day nursery	Approved 11/08/1989	–
<i>Near the Site</i>				
15/1232	Land to the Rear of 146 to 196 Tregwilym Road	Construction of 29 No. residential affordable dwellings and associated works	Approved 12/12/2016	–

24/0552 - Intensification of use of children's nursery increasing number of children being cared for from 53 to 71 and amendments to parking area layout

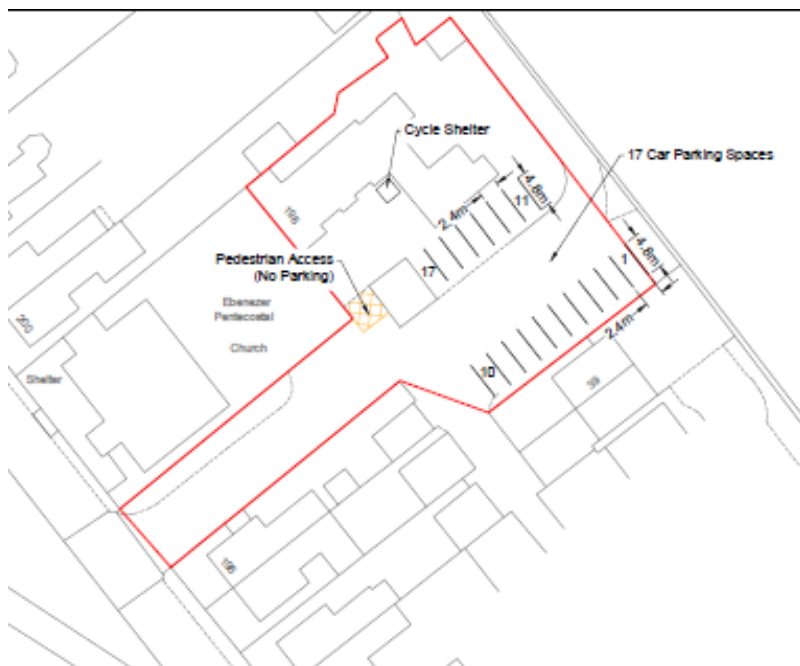
The previous application (for the same description of development) was refused in November 2025 due to the fact that *"the use as the parking area falls outside the control of the applicant resulting in an unacceptable impact upon highway safety"*.

As such, it was considered that the principle of increasing the numbers of children at the nursery were acceptable, and that the submission of a lease of 10 years for the land referenced addresses this reason for refusal. This will be covered in more detail below.

3. Proposed Development

This application seeks full planning permission for the intensification of the use of the children's nursery, from 53 to 71 children. This will increase staff levels to 20 (i.e. an extra 3 staff). As a result, the parking area at the front of the building is to be reconfigured to accommodate an additional 2 parking spaces to accommodate a total of 17 parking spaces at the site.

The parking area is to be reconfigured as shown in the Parking Provision Plan submitted as part of the application:



Parking Provision Plan (Acstro) Dwg Ref. 1087-007 Rev D

The Parking Provision Plan shows how the site can accommodate the additional spaces for staff members without impacting on the existing accesses or adjoining neighbours.

4. Planning Policy Context

The current Local Development Plan for Newport Council consists of the Local Development Plan (2011-2026).

Site Designations

The site is located within the defined Urban Boundary, and within proximity of land designated for employment (land off Chartist Drive) and a housing commitment (Jubilee Park). The site itself is not allocated for any particular use. The LDP constraints map indicates that the site is located within proximity to a C1 flood zone.



LDP Proposals Map Extract

Proposals Map Key			
	Urban Boundary		Employment
	Housing Commitment		



LDP Constraints Map Extract

Constraints Map Key	
	TAN 15 Zone C1

Relevant Policies

Whilst a number of policies are of relevance to the proposal (for example DES1- General Design Considerations), it is considered that the key policies of greatest relevance to the proposal are Policy GP2 – General Amenity and Policy GP4 – Highways and Accessibility. These policies are reproduced as follows:

Policy GP2: General Amenity

"Development will be permitted where, as applicable:

- i) There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality;*
- ii) The proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area;*
- iii) The proposal seeks to design out the opportunity for crime and anti-social behaviour;*
- iv) The proposal promotes inclusive design both for the built development and access within and around the development;*
- v) Adequate amenity for future occupiers."*

Policy GP4: Highways and Accessibility

"Development proposals should:

- i) *Provide appropriate access for pedestrians, cyclists and public transport in accordance with National Guidance;*
- ii) *Be accessible by a choice of means of transport;*
- iii) *Be designed to avoid or reduce transport severance, noise and pollution;*
- iv) *Make adequate provision for car parking and cycle storage;*
- v) *Provide suitable and safe access arrangements;*
- vi) *Design and build new roads within private development in accordance with the highway authority's design guide and relevant national guidance;*
- vii) *Ensure that development would not be detrimental to highway or pedestrian safety or result in traffic generation exceeding the capacity of the highway network."*

Supplementary Planning Guidance

Parking Standards (August 2015)

The Parking Standards SPG was adopted in August 2015, and is considered to be of direct relevance to the proposals. The SPG includes the parking requirements according to land use and location and lists the requirements for commercial vehicles, cars, motorcycles and cycles.

Newport's adopted Parking Standard SPG recommends that nurseries in converted properties should provide 1 car parking space per 2 full-time staff members. The 3 additional staff members therefore generate the need for 2 additional car parking spaces. A total of 17 spaces, compared to the existing approved 15 are therefore required to accommodate the additional staff members.

5. Material Considerations

This section considers and addresses the likely key considerations associated with the development of the proposals for this site. The key material considerations based on the planning history of the site are:

- Principle of the Development;
- Land Ownership;
- Highway Safety; and
- Amenity.

This section covers each of these factors below.

Principle of Development

It is considered that the proposed increase in the number of children that can be cared for by the nursery should be considered acceptable, given that the use of the building has already been established and matters such as highways / road safety have previously been confirmed in the Appeal Decision (Ref. CAS-01814-Z2M0Z7) as being acceptable.

Since the Appeal Decision, the Applicant has implemented the permission through re-configuring the car park (specifically removing the turning area in the middle of the car park) and have confirmed that the new parking arrangements work well to accommodate the increase to 53 children.

The proposal to increase the capacity of the nursery will increase the number of staff which are required on the premises. As a result, Technical Note prepared by Acstro (Ref. 1087-ACS-ZZ-XX-RP-T-301-A) has been commissioned in order to assess what impact this would have to the parking requirements and highways safety.

It is important to note that the nursery is sustainably located, within an existing residential area, close to several new housing developments including the adjacent development at Tregwilym Road, and the large, designated housing allocation within the LDP (Jubilee Park). The nursery is used predominantly by nearby residents, and demand for child

spaces at the nursery has only increased as further residential development has occurred. The intensification of the nursery to accommodate an additional 18 children would therefore help to meet an identified need in the area. Moreover, the additional capacity would help for local parents and children to remain local and avoid the need for travel (by car or otherwise) to attend a nursery elsewhere.

The below image demonstrates the proximity of the nursery to the nearby housing allocations and houses, some completed and some still under construction.



Housing Sites Nearby to the Site

Local Development Policy SP12 'Community Facilities' sets out that *"development of new community facilities in sustainable locations will be encouraged including:*

- i) *Places of worship and church halls, cemeteries, community centres, health centres, day nurseries, clinics and consulting rooms."*

The subtext to the policy also includes the following relevant supporting information:

"Planning Policy Wales (7th Edition, July 2014) notes the importance of providing access to a range of facilities including health, education, community and open spaces, and maximising opportunities for community development and social welfare. Proposals that help achieve this aim, through the provision of new facilities will be encouraged. There is also a need to reduce further inequalities between communities and access to facilities. Essential existing facilities should therefore be retained or enhanced to help ensure that all parts of the community, including rural areas, have effective access to services and community facilities".

Further to the above, the Local Development Plan includes the relevant 'objectives':

- **Objective 1 – Sustainable Use of Land**
To ensure that all development makes the most efficient use of natural resources by seeking to locate development in the most sustainable locations, minimise the impact on the environment and make a positive contribution to local communities.
- **Objective 3 – Economic Growth**

To enable a diverse economy that meets the needs of the people of Newport and those of the wider South-East Wales economic region.

- **Objective 7 – Community Facilities and Infrastructure**

To ensure the provision of appropriate new, and/or enhanced existing, community facilities, and the safeguard existing well-used facilities.

The effect of the nursery accommodating more children will result in additional employment to the nursery – a total of 3 extra staff members. This will provide a further benefit to the local community given the increase in job creation and the economic benefits that will result from this.

It is therefore considered that the principle of development is supported by Local Policy, and should be acceptable accordingly.

Land Ownership

As detailed above, the previous application (LPA Ref. 24/0552) was refused on the basis of one reason for refusal:

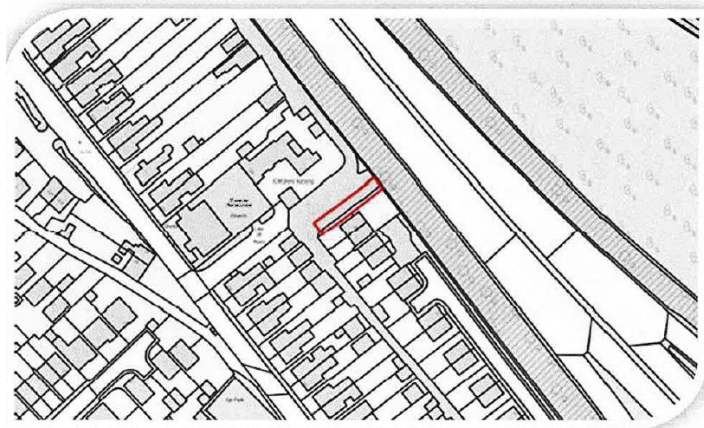
“The proposed development fails to provide sufficient levels of car parking to serve the proposed intensification of the use as the parking area falls outside the control of the applicant resulting in an unacceptable impact upon highway safety. The proposed development is therefore contrary to the requirements of Policy GP4 of the Newport City Council Local Development Plan”.

Although a licence was submitted by the Applicant as part of the previous application, it was considered that the length of the licence was not long enough. The Office Report states at Para 8.5.4:

“The amount of parking provided may be acceptable in highways terms, with bicycle storage secured by way of condition, however the parking layout is not deliverable as a permanent parking solution as the lease only has a 2-year length.”

The Report goes on to state in the Conclusion at Para 10.1: *“The proposal fails to provide sufficient levels of parking or a safe/suitable area for drop off/pick up as the land required to facilitate this is outside the control of the applicant and there is no confidence that the applicant would have control of the land beyond the 2-year lease period.”*

As a result, and over the last several months, a new licence has been agreed (with NCC) which provides a licence of 10 years for the following area of land. A copy of this legal agreement is included in the submission of this application. It is considered that the submission of this licence addresses the previous reason for refusal and allows for a long term solution / provision for the parking arrangements for the site:



Access and Highway Safety

As identified above, the site is sustainably located, with excellent links to public transport provision. Moreover, a number of the users of the facility (i.e. parents of children), work locally or are locally based. These people could access the facility on foot or cycle. To comply with the Parking Standards SPG, it is acknowledged that an additional 2 parking spaces are required due to the increase of 3 staff members. This can be safely achieved by re-arranging the previously approved parking layout. Information is also submitted to confirm that additional parking is also available nearby at the Tregwilym Road Car Park, which could act as an overspill car park. As such, the report concludes that there are no highway related reasons that should prevent the proposed development.

It should be noted that since the Appeal Decision, the car park has been configured with the removal of the turning area in the centre of the car park – an updated site photographs below:



Current Car Park Layout

In respect of the new arrangement proposed in order to accommodate an additional level of parking, Acstro have prepared the Parking Provision Plan which is submitted with the application for approval. This demonstrates that a total of 17 parking spaces can be safely provided on the site to accommodate for both staff and drop off spaces. This is in accord with the Parking Standards SPG and the guidance of providing 1 space per staff member and 3 visitor spaces.

The public car park nearby (Tregwilym Road Car Park) is very underutilised over the course of a standard working day. This is approximately 100m walk from the nursery, where ample spare capacity is available during the daytime hours that the nursery operates, in case there was a need to accommodate additional parking.

As detailed above, it is also important to note that the road conditions have changed since the previous planning application and associated Appeal. Tregwilym Road is now subject to a 20mph, rather than 30mph, speed limit which reduces the visibility requirements for people exiting from the site. This has been demonstrated on drawing 1087-006-A (Technical Note Appendix B) showing that the 2.4m x 25m visibility splays that are appropriate for the new 20mph speed limit are available.

Amenity

The Officers Report for the previous application at the site (LPA Ref. 18/0622) sets out the following in respect of amenity:

"The nursery is a detached property with opening hours known to be 07:30 until 18:00. No objection has been received from Head of Legal and Regulation (Environmental Health) in relation to the application, and it is not considered that

the increase in numbers would result in an unacceptable impact on the amenity of surrounding occupiers in terms of additional noise."

There are no concerns regarding amenity impacts for the increased number of children and it is considered that the nursery building and outdoor space provides enough space to cater for a greater amount of children. Moreover, it is not considered that the intensification of the nursery will have any impact on the existing neighbours in regards to additional noise.

6. Summary and Conclusions

This proposal seeks planning permission for the intensification of the current use of Greenfields Children's Nursery, increasing the number of children being cared for from 53 to 71.

It is considered, and has been demonstrated, that the proposals are acceptable by virtue of the following:

- The principle of the intensification of the current use is supported by both national and local policies. The nursery is situated within a predominantly residential area, where a significant number of houses have recently been built and is sustainable and would support an existing local business which forms an important role and function in providing childcare to local parents and families;
- The nursery is a valuable community facility for families, that also employs a number of people, providing social and economic benefits to the local area. There are further economic benefits from this application in that there will be 3 additional nursery staff jobs created by the increase of child capacity;
- The submitted Highways Technical Note (prepared by Acstro) and plans provide information as to how the parking area can be reconfigured to include further parking spaces to facilitate the additional staff requirements. Information is also submitted to confirm the sustainable location of the site, which includes regular bus services as well as additional parking being accessible across the road from the site; and
- The internal parking and access arrangements on the site (implemented from the Permission Appeal Ref. CAS-01814-Z2M0Z7) have already been put in place by the Nursery and have been used safely and without any issues; and
- The downgrading of the speed limit on Tregwilym Road to 20mph has also provided a further level of safety for people exiting the site in regards to the associated visibility splays.

Having regard to the above considerations, it is considered that the proposed development is in accord with both National and Local Policy, and therefore it is respectfully requested that planning permission be granted.

Yours sincerely,



Geraint John
Director
Geraint John Planning Ltd.