

8th January 2026

Ref: 25/0999 - Willenhall Street, Newport, NP19 0GE

Dear Planning Office / Highway Authority,

We write in response to the Highway Authority's objection and to clarify a number of points where the proposals have been misinterpreted, leading to incorrect assumptions regarding the nature of the development, parking demand, and the applicability of standards.

At the outset, we note that earlier versions of the transport-related documents were previously issued. The correct and fully updated reports, reflecting the agreed assumptions and latest position, are now attached and have been submitted to the Council for consideration as part of this response. These documents should be read in place of the earlier versions.

1. Nature of the First Floor Accommodation – Not Residential / Not HMO

We must strongly and unequivocally clarify that the first-floor accommodation does not constitute residential development and is not an HMO.

The rooms are staff support accommodation ancillary to the operation of the meditation centre, intended solely to support staff presence during extended opening periods, where operationally necessary. The accommodation is:

- Not self-contained
- Not capable of independent occupation
- Not available for general or private residential use
- Not rented, leased, or used as primary living accommodation

There is no change of use to residential, and the accommodation remains functionally and operationally linked to the meditation centre. This reflects the position accepted under the previously approved application (24/0916), where Highways withdrew their objection on the basis that no residential development was proposed.

To remove any residual ambiguity, we are willing to accept a planning condition explicitly restricting the use of the rooms to ancillary staff accommodation only, preventing any future residential or HMO use.

2. Parking Standards and HMO Assumptions

The objection proceeds on the basis that the proposal represents four residential units forming an HMO requiring five parking spaces. As set out above, this assumption is not applicable.

As the accommodation is not residential, residential parking standards should not apply. The rooms do not generate independent travel demand and do not increase staff numbers beyond those already associated with the operation of the centre. In practice, on-site staff presence reduces daily travel movements, rather than increasing them.

3. Relationship Between Staff Numbers and Rooms

The provision of multiple rooms for two staff members reflects operational flexibility rather than residential occupation. The rooms allow for:

- Shift-based working
- Staff wellbeing during extended retreats
- Occasional short-term support staff

This arrangement does not correlate with increased parking demand or residential-style trip generation.

4. Sustainability Assessment and Accessibility Metrics

The updated Sustainability Score and Parking Reduction Calculation should be considered alongside this response.

While the SPG is not explicit for meditation centres, the assessment demonstrates that the site is:

- Accessible by sustainable modes
- Well connected to walking, cycling, and public transport networks

The assessment does not rely on residential trip generators to justify reductions, but instead demonstrates the site's overall accessibility and reduced reliance on private vehicles relative to comparable low-intensity community uses.

5. Transport Statement and Travel Plan

The Transport Statement and Travel Plan have been updated and are now submitted in their correct form.

Given the modest scale of the development, extensive empirical surveys would not be proportionate.

While it is acknowledged that a Travel Plan of this scale will not deliver transformational change, its inclusion reflects a commitment to sustainable travel in line with policy objectives.

6. Parking Demand and Evidence

There is no evidence that the proposals would result in parking demand exceeding existing provision. The development does not materially differ from the previously approved scheme in operational or trip-generation terms.

7. Conditions

Without prejudice to the above, we have no objection to conditions requiring:

- High-quality and retained cycle parking for staff and visitors
- Provision and retention of electric vehicle charging infrastructure
- Restriction of first-floor accommodation to ancillary staff use only

Conclusion

The Highway Authority's objection is founded on a misunderstanding of the nature of the accommodation and on earlier versions of supporting documentation. With the correct reports now submitted and the ancillary staff-only use clarified, there is no substantive highway or parking basis on which to resist the proposal.

We respectfully request that the objection be reconsidered in light of the above.

Kind Regards
Emily & Emma