

PLANNING STATEMENT

# The Priory, Caerleon

Prepared by LRM Planning Limited on behalf  
of The Priory

October 2025



PLANNING  
LIMITED

# Contents

1 Introduction .....3

2 Site description and context.....5

3 Proposed development ..... 6

4 Planning policy framework .....7

5 Appraisal and conclusion.....10

## DOCUMENT CONTROL

|                 |                      |                   |                         |
|-----------------|----------------------|-------------------|-------------------------|
| Project:        | The Priory, Caerleon | Job Number:       | 25.133                  |
| Client:         | The Priory           | Date:             | 09/10/2025              |
| Author Initial: | CW                   | Reviewer Initial: | SH                      |
| Issue:          | 1                    | Status:           | Draft for client review |
| File Origin:    | 25.133/6.Reports     |                   |                         |

# 1 Introduction

- 1.1 LRM Planning have been instructed by the proprietors of The Priory to prepare this Planning Statement to accompany a listed building consent application for the proposed relocation and internalisation of existing kitchen extraction equipment and associated works, located at The Priory, High St, Caerleon, Newport NP18 1AG.
- 1.2 In April 2025, an enforcement notice was issued by Newport City Council following the unauthorised installation of extraction flues to the rear (south) and side (east) external elevations of The Priory. Following a meeting with the East Area Planning Manager, it was determined that the siting of the equipment was unlawful and of detriment to the listed building, and that relocating the extraction flues would be required.
- 1.3 This statement forms part of a suite of drawings and documents submitted in support of the application. The Planning Statement and accompanying drawings demonstrate the suitability of the site to accommodate the proposed development. The full suite of documents submitted comprises:

| (DOCUMENT)/DRAWING                                | (REF. IF APPLICABLE)      | PREPARED BY                                 |
|---------------------------------------------------|---------------------------|---------------------------------------------|
| Planning Application Forms                        | PP-14382336               | LRM Planning                                |
| Location plan                                     | -                         | SLP                                         |
| Extraction equipment existing location plan       | 200                       | SLP                                         |
| Extraction equipment existing location references | 201                       | SLP                                         |
| Extraction equipment proposed location references | 202                       | SLP                                         |
| Kitchen ventilation design drawings               | TPC-CCF-ZZ-ZZ-M3-Y-0001-H | Concept                                     |
| Heritage Impact Assessment                        | edp9277_r001a             | The Environmental Dimension Partnership Ltd |
| Noise Assessment                                  | 25-243                    | InAcoustic                                  |
| Product card                                      | MUB/T 062 630D4 IE2       | Systemair Online Catalogue                  |
| Cylindrical cased axial flow fans                 | TCBBx2 / TCBTx2           | Soler & Palau                               |

- 1.4 The following sections discuss the site and its context; the proposed development; planning policy context; an appraisal of the development; and a conclusion in respect of the application submitted herein.

## 2 Site description and context

---

- 2.1 The application site comprises external extraction flues and associated ducting positioned on the south and east elevations of The Priory Hotel in Caerleon. The Priory Hotel is a Grade II listed building on the High Street of Caerleon, which has functioned as a hospitality establishment within the local area for circa 40 years. Pedestrian access into the site is through the main entrance of the property on High Street, with vehicular access via Broadway to the west, from where access can be gained to the car park. The site is well-connected by sustainable transport options and located adjacent to the District Centre for Caerleon as defined by the Local Development Plan. The Priory is well served by public transport, being 250m walking distance from north and southbound bus services interlinking Caerleon with the city centre, Cwmbran and Monmouth.
- 2.2 The Priory is listed building under Cadw reference 2981, designated as an early 19<sup>th</sup> century Tudor Revival house with earlier origins, overlaid by alterations updating the premise to a late 20<sup>th</sup> century hotel, but still retaining significant character and strong group value within the historic centre of Caerleon. The listing information from Cadw states that the building is constructed of local red sandstone conglomerate rubble with freestone dressings and features slate roofs with red brick chimneys.
- 2.3 The site is located within the Caerleon Conservation Area as defined by the Local Development Plan Proposals Map for the Authority and lies adjacent to the boundaries of the *Caerleon Legionary Fortress: Area between the Priory Hotel and Lodge* scheduled monument designation, which includes the bulk of the garden area and car park associated with the Priory, but excludes the building itself and the hardstanding areas to its rear. Cadw states that the scheduled monument designation forms an important element within the wider context of the Roman occupation of Wales and the associated structures may contain well preserved archaeological evidence concerning chronology, layout and building techniques. Accordingly, the site is located within an Archaeologically Sensitive Area.
- 2.4 The part of the building subject to this application comprises a small, two-storey range located at the south-eastern corner of The Priory. It adjoins the staircase range to the north, which provides the only internal access between the ground and first floors, and is entirely restricted to this peripheral corner of the listed building, with no other part of its physical form or historic fabric proposed to be affected by the implementation of the proposals.
- 2.5 The primary concern for enforcement officers focused on reducing the impact of the existing flue arrangement, which was considered to represent a dominant feature when viewed from the neighbouring listed building space and to create an inappropriate visual relationship with the adjoining residential property, as well as potentially detrimental to the surrounding noise environment.

### CONTEXT CONSIDERATIONS

- 2.6 **Flooding:** The newly adopted Flood Maps for Planning, produced by Natural Resources Wales, identify the site to lie within flood zone 1, denoting areas at little to no risk of fluvial/tidal flooding. The site is also within the equivalent flood zone for surface water.
- 2.7 **Ecology and trees:** The site comprises solely of the existing building, so there are no implications in respect of trees or ecology.

### 3 Proposed development

---

- 3.1 The proposed development seeks Listed Building Consent for the removal of unauthorised external kitchen extraction equipment and the internalisation of a revised extraction system within the first-floor private dining room. The works include the creation of a discreet vent through the east-facing elevation by replacing an existing door and window with louvred panels to serve the new system. This location has been carefully selected to ensure the installation remains unobtrusive and does not conceal or detract from important architectural features of the previously affected façades of the listed building.
- 3.2 The proposals also include the repair and reinstatement of the affected window frame on the rear (south) elevation, along with the formation of a square opening in the ground-floor kitchen ceiling to accommodate new internal ductwork, and minor associated alterations required to connect the revised extraction system. These works are limited to the previously modified area at the eastern end of the building and have been carefully designed to avoid any further impact on the listed fabric or its architectural character.
- 3.3 The extraction equipment will be free-standing on the existing floor of the private dining room, requiring no fixings or physical interventions to the historic fabric of the listed building other than the formation of a small square opening in the floor to accommodate the internal ductwork.

## 4 Planning policy framework

---

- 4.1 The planning policy context for the determination of this application is provided by national and local planning policy guidance. National guidance is set out within Future Wales, Planning Policy Wales and the accompanying Technical Advice Notes. Local policy comprises the Newport Local Development Plan (adopted 2015) and its supporting Supplementary Planning Guidance (SPG) documents.

### FUTURE WALES: THE NATIONAL PLAN 2040

- 4.2 Future Wales serves as the principal national development framework established by the Welsh government. It outlines a comprehensive strategy for addressing critical national priorities through the planning system over the forthcoming two decades. These priorities encompass fostering a resilient and dynamic economy, achieving decarbonisation and climate resilience, promoting the development of robust ecosystems, and enhancing public health and well-being.

### PLANNING POLICY WALES

- 4.3 Planning Policy Wales (PPW) is the principal national planning policy document which sets out the land use policies of the Welsh Government (WG) against which development proposals should be assessed. The latest version is the twelfth edition, published in February 2024.
- 4.4 The central aim of PPW is to ensure that the planning system fosters sustainable development, promoting the social, economic, environmental, and cultural welfare of Wales. Placemaking is a key element of PPW, with policies and decisions on development required to prioritize these guiding principles.
- 4.5 Section 6 of PPW focuses on distinctive and natural places, those which promote unique features associated tied to their natural or cultural heritage. It emphasises that such places should be recognised and valued in their own right, and that their character should be protected and enhanced. Paragraph 6.1.6 sets out WG objectives for the historic environment, including the need to *“safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved.”* Furthermore, paragraph 6.1.7 highlights that *“it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.”*
- 4.6 Regarding listed buildings, Paragraph 6.1.10 states that *“there should be a general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage.”* Further detail is provided at Paragraph 6.1.11, which advises that the overriding aim should be to *“find the best way to protect and enhance their special qualities, retaining them in sustainable use.”*
- 4.7 Paragraph 6.1.13 requires applicants for listed building consent to demonstrate clearly why alteration or demolition is desirable or necessary. It further stipulates that the likely impact on the significance of the building must be addressed within a proportionate heritage impact statement, calibrated both to the importance of the asset and the scale of change proposed.
- 4.8 Paragraphs 6.1.14 to 6.1.18 provide broad guidelines for development proposals within or affecting conservation areas. 6.1.16 states that *“preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area’s character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area.”*

## TECHNICAL ADVICE NOTES (TAN)

- 4.9 TAN 23 (Economic Development), published in February 2014, is of particular relevance to the consideration of this proposal. It includes any form of development that generates wealth, jobs and income, and emphasises *“it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.”*
- 4.10 TAN 24, published in May 2017, relates to the historic environment and aspects which contribute to such settings. The purpose of the TAN is *“to provide guidance on how the planning system considers the historic environment during...decision making on planning applications”*. It is underpinned by six Conservation Principles, which should be understood in advance of any planning application being submitted. These are:
1. *Historic assets will be managed to sustain their values.*
  2. *Understanding the significance of historic assets is vital.*
  3. *The historic environment is a shared resource.*
  4. *Everyone will be able to participate in sustaining the historic environment.*
  5. *Decisions about change must be reasonable, transparent and consistent.*
  6. *Documenting and learning from decisions is essential.*

## WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015

- 4.11 The Well-being of Future Generations Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principles, and to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Its content is sought to be delivered through the planning system via the intertwining of the Act through the new PPW.

## OTHER RELEVANT NATIONAL POLICY

- 4.12 Given that the proposal details alteration to a listed building and is in a conservation area, national legislation in this regard applies. This is to be found in the Historic Environment (Wales) Act 2023, which sets out the position in respect of the stance of Welsh Government on listed buildings and how listed building consent applications are evaluated and determined across Wales. It states at section 96(2) that:

*“In considering whether to grant Listed Building Consent, a planning authority or the Welsh Ministers must have special regard to the desirability of preserving*

- a) The listed building to which the application relates,*
- b) The setting of the building, and*
- c) Any features of special architectural or historic interest the building possesses”*

## LOCAL DEVELOPMENT PLAN

- 4.13 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The development plan for the site comprises the Newport Local Development Plan (LDP), which was adopted in January 2015 and covers the period up to 2026. A Replacement LDP is in the process of being prepared, but at this stage carries limited weight as consultation on the Deposit plan is not expected until early 2026.

- 4.14 The current LDP details objectives including Objective 5, Conservation of the Built Environment, which requires that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment.
- 4.15 Policies with a prefix of SP are Strategic Policies that provide the overall direction for the Plan, and broad locations for development. Policy SP9 relates to the conservation of the natural, historic, and built environment, and states that the conservation, enhancement and management of recognised sites will be sought in all proposals.
- 4.16 Policies with a prefix of GP are General Development Principles, applicable to any development that is proposed in Newport. Policy GP7 seeks to ensure that development does not result in any unacceptable harm to the amenity of existing or future occupiers, including through adverse impacts such as noise, disturbance, or loss of privacy.
- 4.17 Policy CE7 sets out a list of criteria required for development within or adjacent to conservation areas.
- *Be designed to preserve or enhance the character or appearance of the conservation area, having regard to the conservation area appraisal where appropriate.*
  - *Avoid the removal of existing historic features, including traditional shopfronts and joinery.*
  - *Use materials which are traditional, or appropriate to their context.*
  - *Complement or reflect the architectural qualities of nearby buildings which make a positive contribution to the character of the area.*
  - *Pay special attention to the settings of buildings and avoid the loss of any existing domestic gardens and open spaces which contribute to the character of the area.*
  - *Avoid adverse impact on any significant views, within, towards and outwards from the conservation area.*

## 5 Appraisal and conclusion

---

- 5.1 This Planning Statement is produced in support of a listed building consent application for the proposed relocation and internalisation of existing kitchen extraction equipment and associated works at The Priory in Caerleon. No groundworks or any permanent works are proposed, other than the small square opening to accommodate internal ductwork.
- 5.2 The principle of the proposal accords with guiding objectives of both Planning Policy Wales (PPW) and the Local Development Plan as it seeks to remove the unauthorised extraction system and ductwork, thereby reinstating the historic integrity of the building and addressing the harm previously caused to its significance.
- 5.3 The proposal successfully addresses the concerns of the enforcement officers by removing the unauthorised external extraction system and relocating all associated equipment internally. This approach enables the continued operation of the kitchen facilities while eliminating visual clutter from the listed building façade, thereby mitigating previous harm to its appearance and setting in accordance with Policy SP9. In this regard, the internal siting of the extraction system ensures that important architectural features of the rear and side elevations remain unobscured, and the special character of the building is preserved.
- 5.4 It is recognised that the proposal also responds to enforcement concerns relating to potential noise disturbance from the extraction system. A detailed Noise Assessment by InAcoustic is submitted with this application, demonstrating that emissions from the proposed extract and air supply systems would not exceed existing background sound levels at the nearest residential receptor. In this regard, the development is considered to have no adverse impact on neighbouring residential amenity in terms of noise, thereby satisfying relevant policy requirements.
- 5.5 It is considered that the proposals for The Priory are sufficiently limited in scope and extent that they would have no wider effect upon the character or appearance of the Caerleon Conservation Area and its extensive designation, in accordance with Policy CE7. The same is true for the ancient scheduled monument designation and the location of the site in an area of archaeological sensitivity, given that the proposal does not involve the breaking of ground. The Heritage Impact Statement submitted with this application, by the Environmental Dimension Partnership, illustrates how there is no wider experience or appreciation of the proposed development from beyond the landscaped grounds of the hotel, especially due to the fact that it is positioned at the rear of the listed building (and the historic High Street) and it would be wholly limited to the side elevation.
- 5.6 Additionally, the overriding principles of Planning Policy Wales (PPW) are met. In this respect, the proposal represents a sustainable form of development that supports the continued operation of an established local business at the heart of a historic town, within the defined settlement boundary. By addressing heritage and amenity considerations through sensitive internalisation of the extraction system, the scheme contributes to the long-term viability of the site and the wider local economy, consistent with the aims of PPW to promote sustainable development and the reuse of existing buildings. The site is also located in close proximity to sustainable transport options.
- 5.7 Accordingly, it is clear that the proposal represents a suitable and appropriate form of low impact development that contributes to mitigating the impact on the character of the listed building. The Heritage Impact Statement concludes that the works proposed represent the option which is most consistent with the conservation of this asset and that they could be completed without causing any loss to the significance of the listed building. The proposals accord with the relevant national and local planning policies and are therefore considered acceptable. It is respectfully recommended that Newport City Council puts the application forward for approval.

#### **CARDIFF OFFICE**

22 Cathedral Road, Cardiff, CF11 9LJ  
02920 349737

admin@lrmp planning.com  
lrmp planning.com

© LRM Planning Limited 2025

#### **EXETER OFFICE**

Winslade Manor, Manor Drive, Clyst St Mary,  
Exeter EX5 1FY, 01392 690060



Registered Office: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ  
Registered in England and Wales No 08618388 VAT Reg No 196 5837 49



**RTPI**  
Chartered Town Planner