

From:

Sent: 29 October 2025 17:13

To: Hawkins, Grant (Senior Planning Officer) <Grant.Hawkins@newport.gov.uk>

Subject: Detailed Scrutiny of Highway Response: Ref 25/0841

Proposal: Change of use from dwelling (C3) to 4-bedroom House in Multiple Occupation (C4)

Site: 7 Conway Road, Newport NP19 8PA

Highway Recommendation: Not policy compliant

1. Policy Non-Compliance: A Dismissive Label Without Consequence

The Highway Officer states the proposal is “not policy compliant” but fails to recommend refusal. This contradiction undermines the credibility of the assessment. If a scheme breaches adopted policy—particularly in relation to bin and cycle storage and parking standards—then approval should not be entertained without robust mitigation or redesign.

- Challenge: Why is non-compliance acknowledged but not acted upon? The absence of a refusal recommendation despite policy breach suggests a failure to uphold planning standards.

2. Bin Storage: A Known Problem, But Still a Problem

The officer admits there is “no scope for meaningful provision” of bin storage and predicts bins will be left on the highway permanently. This is a serious concern:

- Visual and public realm impact: Permanent bin obstruction degrades streetscape quality and pedestrian access.

- Amenity harm: Overflowing or mismanaged bins attract vermin and odour, especially with intensified residential use.
- Responsibility vacuum: The assumption that “nobody has responsibility” in HMOs is not just speculative—it reflects a known management failure in such conversions.
- Challenge: Why is this predictable harm dismissed as “existing”? Intensification of use exacerbates unmanaged waste issues and should be treated as a material planning harm.

3. Cycle Storage: Acknowledged Barrier to Sustainable Travel

The officer concedes that cycle use is not encouraged due to lack of rear access and the impracticality of pushing bikes through the house. This undermines both Active Travel goals and the sustainability claims of the applicant.

- Challenge: If the development actively discourages sustainable transport, how can it be considered acceptable under national and local planning frameworks that prioritise modal shift?

4. Parking Survey: Methodological Flaws and Questionable Evidence

The parking survey is criticised for failing to follow accepted methodology and presenting inaccurate photographic evidence:

- Unreliable data: Photos are not time-stamped, mislabelled, and duplicated.
- High parking stress: Even flawed data shows significant pressure on local parking.

- SPG reliance on snapshots: The officer admits reliance on “two snapshots” is insufficient, yet still accepts the survey.
- Challenge: Why is a flawed survey used to justify compliance? The officer’s own critique undermines the evidential basis for accepting the parking provision.

5. 🚗 Parking Demand: Theoretical vs. Real

The officer notes that SPG parking demand “does not often materialise for HMOs.” This is speculative and dismisses real-world impacts:

- HMO occupancy is variable and often high: Four adults with separate vehicles is not uncommon.
- Visitor and service vehicle demand: HMOs generate more transient traffic than single dwellings.
- Challenge: Why rely on theoretical assumptions when empirical evidence shows high stress and inadequate provision?

6. 🗑️ Block Plan Inconsistencies: Bin and Cycle Store Not Referenced

The officer notes that bin and cycle stores are “indicated on the block plan” but not referenced elsewhere, and that a combined store “could not be accepted.”

- Challenge: Why is this not treated as a design failure? If the block plan is inconsistent with the application documents, it should be grounds for refusal or re-submission.

7. Impact Dismissal: “Existing Issues” Argument

The officer repeatedly states that bin, cycle, and parking issues are “existing” and therefore not grounds for objection. This is procedurally and substantively flawed:

- Planning law requires assessment of cumulative impact. Intensification of use must be assessed in context—not dismissed because problems already exist.
- Challenge: Why is cumulative harm ignored? The proposal worsens known issues and should be judged on its additive impact.

8. Conditions as a Substitute for Compliance

The officer suggests that conditions could be imposed for bin and cycle storage. This is inadequate:

- No feasible location: The site lacks rear access and internal circulation space.
- Combined store rejected: Even the suggested solution is deemed unacceptable.
- Challenge: Why propose conditions that cannot be met? This undermines the enforceability and credibility of the planning process.

9. Sustainability Study: Dismissed Without Detail

The officer notes the sustainability study is “not sufficiently detailed and does not help.” This vague dismissal lacks transparency:

- Challenge: What specific deficiencies exist in the study? If it fails to justify reduced parking, then the default requirement must apply.

10. 🚫 Procedural Inconsistency and Lack of Rigour

The overall tone of the response is one of reluctant acceptance despite multiple acknowledged failures:

- Contradictions: Policy breach is acknowledged but not enforced.
- Speculation over evidence: Assumptions about HMO behaviour replace empirical analysis.
- Challenge: Why is the planning authority tolerating a proposal that fails on multiple fronts?