

From:

Sent: 29 October 2025 18:11

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

Subject: CONTRADICTION PARKING EVIDENCE

Proposed Conversion of 7 Conway Road, Newport to a House in Multiple Occupation (HMO)

1. Introduction

This objection is submitted in response to Planning Application 25/0841, which proposes the conversion of 7 Conway Road, Newport into a House in Multiple Occupation (HMO). The objection is grounded in material planning considerations, including parking stress, residential amenity, procedural flaws in the submitted parking survey, and conflict with local and national planning policy.

2. Policy Context

The proposal conflicts with:

- Policy H4 (Newport Local Development Plan): Requires HMOs to demonstrate no adverse impact on parking, amenity, or character.
- Supplementary Planning Guidance (SPG) on Parking Standards: Mandates adequate off-street parking and robust survey methodology.
- Planning Policy Wales (Edition 11): Emphasizes sustainable development and protection of residential amenity.

3. Procedural and Evidentiary Flaws in Parking Survey

The submitted parking survey fails to meet the evidentiary threshold required under the SPG and Planning Policy Wales. Specific flaws include:

- Methodological opacity: No clear explanation of survey timing, duration, or

sampling intervals.

- Omission of quiet-hour saturation: Survey does not account for static overnight occupancy.
- Failure to reflect real-world conditions: Survey conclusions contradict observable parking stress.
- Temporal limitation: The survey omits weekend data, which is critical in assessing residential parking demand. This objection includes photographic evidence from Thursday (16 October), Friday (yesterday, 17 October), and Saturday (today, 18 October), thereby capturing weekday and weekend conditions.

4. Photographic Evidence Undermining Survey Validity

4.1 Overview

This expanded photographic record includes both evening and daytime captures, offering a comprehensive view of parking saturation and architectural context surrounding 7 Conway Road. The evidence demonstrates persistent congestion, static occupancy, and structural constraints that invalidate the submitted parking survey.

4.2 Methodology

- Location: Conway Road and adjacent streets
- Date Range: Thursday 16 October to Saturday 18 October 2025
- Timeframe: 09:40 to 21:48
- Conditions: Overcast daylight and evening hours under streetlight illumination
- Duplicates Removed: Only unique timestamps, angles, and vehicle configurations retained

4.3 Photographic Record

Timestamp	Description	Commentary
09:40	Narrow street, full occupancy both sides	Morning saturation contradicts assumptions of daytime availability
10:03	Multiple captures showing static vehicle layout	No turnover; consistent congestion across angles
11:09	Elevated view of terraced street, full parking	Architectural density and lack of off-street options evident
11:16	SD14 RVK visible; saturation persists	No gaps; congestion extends into late

morning

11:18 Red car foreground; unchanged layout Reinforces static occupancy and lack of churn

18:44 HV18 OYO in foreground; full occupancy Evening saturation begins early

19:01 Terraced row with parked vehicles; no turnover Static occupancy undermines dynamic parking assumptions

19:55 Red car and white van; unchanged layout Reinforces lack of churn in evening hours

20:14 Dimly lit street; full occupancy No available bays; quiet hour congestion evident

21:46 DE18 VET visible; full saturation No transient parking observed; survey underrepresents demand

21:48 MJ73 ZSV and others; unchanged layout Survey fails to account for persistent overnight occupancy

4.4 Image Gallery

Images are embedded below with timestamp annotations and contextual commentary.

- 09:40 – Morning saturation, no turnover
- 10:03 – Multiple angles, static layout
- 11:09 – Elevated view, architectural density
- 11:16 – SD14 RVK, full occupancy
- 11:18 – Red car foreground, unchanged layout
- 18:44 – HV18 OYO, evening saturation begins
- 19:01 – Static occupancy, no turnover
- 19:55 – Repetition of vehicle layout
- 20:14 – No available bays
- 21:46 – DE18 VET, unchanged positioning
- 21:48 – MJ73 ZSV, consistent saturation

5. Conclusion

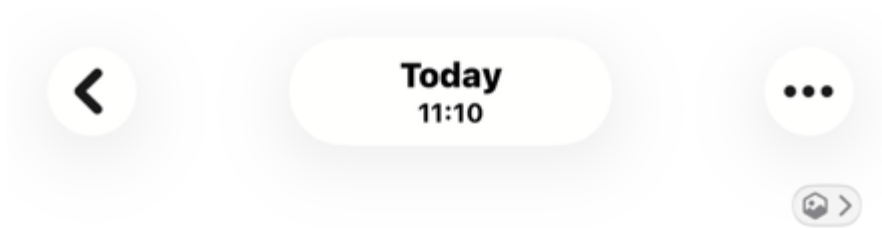
The photographic evidence presented herein constitutes material opposition to the parking survey submitted with Planning Application 25/0841. It demonstrates that:

- The claimed availability of on-street parking is factually inaccurate.
- The methodology of the survey is flawed and fails to capture static overnight

conditions.

- The omission of weekend data renders the survey incomplete and misleading.
- The proposed intensification via HMO conversion would exacerbate existing saturation, contrary to Policy H4 and SPG on Parking Standards.

The planning authority is urged to reject the application on the grounds of demonstrable harm to residential amenity, parking stress, and procedural insufficiency.





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