



Planning, Design and Access Statement

Proposal: Retrospective Change of Use from Dwelling (C3) to 5-Bedroom House in Multiple Occupation (HMO) (Use Class C4)

Site Address: 3 Baldwin Street, Newport, NP20 2LT

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1.0 Introduction

This statement is submitted in support of a retrospective planning application to regularise the use of 3 Baldwin Street as a 5-bedroom House in Multiple Occupation (HMO).

The property presently holds a valid HMO License (Ref: 24/02136/HMOI) issued by Newport City Council on 25th February 2025 for up to 9 occupants. The Local Authority's Housing Standards team has therefore already assessed the property and deemed it safe and suitable for this intensity of occupation.

This planning application seeks permission for a less intensive use (5 bedrooms accommodating up to 7 occupants). The proposal represents a sustainable reuse of existing housing stock, contributing to Newport's housing targets while strictly adhering to the flood safety parameters established by the approved technical assessments for this specific building block.

2.0 Site Context and Analysis

2.1 The Site and Surroundings

The application site is a two-storey corner property situated at the junction of Baldwin Street and Courtybella Terrace within the Pillgwenlly Ward.

- **Built Character:** The immediate street scene is characterised by high-density, traditional Victorian terraced housing with brick and render finish. The site benefits from private rear garden amenities.
- **Wider Context:** While the site itself is residential, it sits within a highly sustainable mixed-use precinct, located just 0.1 miles (approx. 160m) from the Commercial Road District Centre. This ensures residents have immediate access to shops and services without disturbing the residential nature of Baldwin Street itself.
- **Topography:** The site is level and sits within the established urban street frontage.

2.2 Material Planning History (The "Precedent")

The planning history of this specific corner block is a material consideration of significant weight in the determination of this application.

- The "Parent" Permission (Ref: 16/1191): In 2017, the Council approved the conversion of the entire corner site (comprising 3 Baldwin St & 24 Courtybella Tce) into three residential units. This permission established an accepted density of 7 bedrooms across the site.
- The Neighbour Precedent (Ref: 24/0358 - Approved April 2025): On 10th April 2025, the adjacent property at 24 Courtybella Terrace was granted permission to be retained as a dwelling. This approval was granted under an Affordable Housing Scheme.
 - *Crucial Precedent:* Condition 04 of that approval mandates that the ground floor remains non-habitable to mitigate flood risk. This establishes the principle that residential use is acceptable in this location provided the ground floor is protected.

2.3 Sustainability and Access

The site is located within a highly sustainable urban area.

- Walking: The Commercial Road District Centre is just 0.1 miles away, providing immediate access to pharmacies, grocery stores, and post offices.
- Public Transport: High-frequency bus stops are located on Commercial Road (e.g., Pillgwenlly Police Station stop), offering direct and frequent links to Newport City Centre and the wider region.
- Employment & Health: The site is within walking distance of major employment hubs including the Royal Gwent Hospital (approx. 10-15 mins walk) and the City Centre.

3.0 Planning Policy Justification

The proposal has been assessed against the relevant policies of the Newport Local Development Plan (LDP) 2011-2026, Planning Policy Wales (Edition 12), and the relevant Supplementary Planning Guidance (SPG) documents.

3.1 Flood Risk and Justification (Policy SP3 & TAN 15)

Policy SP3 states: *"Development will not be permitted in flood risk areas unless it can be demonstrated that the consequences of flooding can be acceptably managed."*

A. Justification Test: The development satisfies the justification criteria of TAN 15:

1. Regeneration: It assists in the regeneration of the Pillgwenlly area by maintaining an existing building in beneficial use, preventing vacancy and decay.
2. Brownfield Land: The site is previously developed land (brownfield).

B. Consequences of Flooding: The site lies within Zone C1 of the DAM and Flood Zone 3 (Sea). To demonstrate safety, this application relies upon the comprehensive Flood Consequences Assessment (FCA) and Addendum accepted by the Council for the attached property (Ref: 24/0358).

In strict adherence to the accepted technical reports (Refs: *KRS.0848.001.R.001.A* and *KRS.0848.001.R.002.A*), the proposal adopts the following mitigation strategy:

1. Vertical Zoning (Avoidance): All sleeping accommodation is restricted to the first floor (approx. 2.8m above ground level). The ground floor is permanently designated for non-habitable uses only (kitchen, living, storage). This ensures all occupants are located above the critical 9.77m AOD extreme flood level.
2. Resilience: The ground floor features solid flooring, water-resistant finishes, and raised electrical sockets (min 1000mm above floor level).
3. Protection: Non-return valves are installed on ground floor drainage to prevent backflow.

4. Evacuation: A Flood Warning and Evacuation Plan is in place, utilising the ~48-hour tidal warning window provided by Natural Resources Wales.

3.2 Highways and Parking (Policy GP4)

Policy GP4 states: *"Development proposals should provide appropriate levels of parking... and should not result in a detrimental impact on the highway network."*

Sustainability Assessment (Parking Standards SPG - Appendix 5): The Parking Standards SPG (2015) allows for a reduction in parking requirements based on a "Sustainability Points" assessment (Appendix 5). The site achieves an exceptional score against these criteria:

- Local Facilities: The site is 0.1 miles (approx. 160m) from Commercial Road. As this provides access to a District Centre within 200m, it scores double points (6 points).
- Public Transport: Access to high-frequency bus stops within 300m (3 points).
- Frequency: Bus services operate every 10 minutes or less (2 points).
- Total Score: 11 Points. Result: According to Appendix 5 of the SPG, a score of 10+ points justifies a maximum reduction of 2 parking spaces for residential developments. This high score provides robust evidence that the site is located where car-free living is genuinely viable, supporting the case for zero off-street provision in this specific context.

The "Reduction in Density" Calculation: Furthermore, the proposal generates a reduction in parking demand compared to the maximum density previously approved:

- Approved Site Density (Ref: 16/1191): 7 Bedrooms (approved across the corner block).
 - Proposed Site Density (3 Baldwin St): 5 Bedrooms (accommodating 7 occupants).
- Conclusion: The proposed use is significantly less intensive than the total capacity previously approved. It sits comfortably within the established highway capacity.

Sustainable Transport: To support car-free living, secure undercover cycle storage is provided within the property's existing enclosed side alleyway. This area benefits from secure double-door access directly to the street and easily accommodates 3+ bicycles,

strictly complying with the Council's minimum requirement of 1 space per 2 bedrooms. This existing facility provides excellent security and weather protection, encouraging residents to use sustainable transport modes (cycling) for commuting, fully aligning with the Council's Sustainable Travel SPG.

3.3 HMO Concentration (Policy H8)

Policy H8 states: *"Proposals for HMOs will only be permitted where the concentration of HMOs within a 50m radius does not exceed 15%."*

Assessment against HMO SPG (2017): The proposal has been assessed using the methodology defined in Paragraph 5.5.5 of the Houses in Multiple Occupation SPG (Jan 2017), using a 50-metre radius from the application site.

- Evidence: A review of the HMO Public Register (Jan 2026) confirms that Baldwin Street has zero other licensed HMOs.
- Radius Check: Within the 50m radius, the only nearby licensed HMOs are at 1 Jeddo Street and 7 Courtybella Terrace.
- Compliance: Given the high residential density of the surrounding terrace (approx. 35-40 units), the addition of this single HMO keeps the concentration significantly below the 15% threshold defined in the SPG for this area.

Principle of Use: As stated in Section 4.1 of the HMO SPG, the Council acknowledges that *"The conversion of properties to HMOs can make a valuable contribution to Newport's housing stock... providing accommodation for a wide range of groups, including young professionals, students, and persons on low incomes"*. This proposal fulfils that strategic housing role.

3.4 General Amenity (Policy GP2)

Policy GP2 states: *"Development will be permitted where... there will not be a significant adverse effect on the amenity of the occupiers... and adequate waste storage is provided."*

Noise and Disturbance: The use as a 5-bedroom HMO is residential in nature. The intensity of use (maximum 7 persons) is comparable to a large family unit and is significantly less

than the 9 persons currently permitted by the HMO license. Acoustic insulation measures align with Guidance Note FC 4.1 of the Flat Conversions SPG to ensure privacy between floors.

Waste Management Strategy: The waste strategy strictly adheres to Guidance Notes 1 and 2 of the Waste Storage and Collection SPG (Dec 2025).

- External Storage: The SPG states *"It is not acceptable for waste to be stored for a long period of time within a dwelling."* Accordingly, a dedicated, external bin store is provided in the rear yard.
- Capacity: The store exceeds minimum requirements for a 7-person household:
 - Refuse: Space for 1 x 240L Wheelie Bin (or 2 x 120L bins), complying with Table 1 of the SPG for 6-7 residents.
 - Recycling: Dedicated space for multiple recycling boxes/bags and food waste caddies, as required by the Council's source-segregated system.
- Amenity Protection: This ensures no bins are stored on the highway, preventing visual blight and obstruction.

3.5 Character and Design (Policy GP6)

Policy GP6 states: *"Good quality design will be sought in all forms of development."*

- External Appearance: No external alterations or extensions are proposed. The building retains its traditional brick and render appearance, maintaining the rhythm of the street scene.
- Internal Layout: The layout complies with the Council's HMO standards for room sizes and communal space, ensuring a high quality of living for tenants.

4.0 Operational Management & Community Safety

To ensure the property makes a positive contribution to the neighbourhood, the following management measures are in place:

1. Professional Management: The property is professionally managed in accordance with the conditions of the HMO License. This includes regular inspections and a direct point of contact for neighbours to report any issues.
2. Tenancy Agreements: All tenants sign agreements with strict clauses regarding noise, waste disposal, and anti-social behaviour.
3. Security: The property operates on "Secured by Design" principles, with secure locks on the front entrance and individual room locks, ensuring the safety of residents and preventing unauthorized access.

5.0 Green Infrastructure Statement

In compliance with Planning Policy Wales (Edition 12) and the "Step-Wise Approach" to biodiversity, the proposal incorporates proportionate ecological enhancements:

- Water Management (SuDS): A 200L water butt is installed in the rear courtyard. This harvests rainwater for plant watering and provides small-scale attenuation of surface water runoff, relieving pressure on the combined sewer system.
- Biodiversity Net Benefit: A bird nesting box (suitable for House Sparrows or Swifts) will be installed on the rear elevation (north/east facing) at eaves level. This provides new nesting habitat for urban bird species.
- Permeability: The rear amenity space utilises permeable surfaces where possible to facilitate natural drainage.

6.0 Conclusion

The proposal represents a sustainable, safe, and policy-compliant use of the property.

1. Meets Housing Need: It fulfils the strategic role of HMOs as recognised in the HMO SPG, providing essential, high-quality affordable housing in a regeneration area.
2. Ensures Safety: It adopts a robust "First Floor Sleeping" strategy backed by an accepted FCA, ensuring occupants are safe from flood risk.
3. Protects Amenity: It is supported by an exceptional Sustainability Score (11 points) which justifies the reduced parking provision and creates no net increase in parking demand compared to the parent permission.



4. Betterment: It proposes a use that is less intensive (5 bedrooms) than the existing lawful capacity of the HMO license (9 persons).

The applicant welcomes reasonable planning conditions to secure the non-habitable status of the ground floor and the maximum occupancy of 7 persons, ensuring the development remains within the assessed safety parameters in perpetuity.

We respectfully request that retrospective planning permission be granted.