



LRJ PLANNING

Planning, Design and Development

PLANNING STATEMENT

PROPOSAL: INCREASE IN THE SIZE OF A HOUSE IN MULTIPLE OCCUPATION FROM A 4 BEDROOM (C4 USE) RESTRICTED BY CONDITION 2 OF PLANNING PERMISSION REFERENCE: 19/0006 TO A 6 BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE)

CLIENT: WILD MEADOW PROPERTY LTD

SITE: 19 VICTORIA AVENUE, NEWPORT, NP19 8GF

DATE: APRIL 2025



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1.0 Introduction

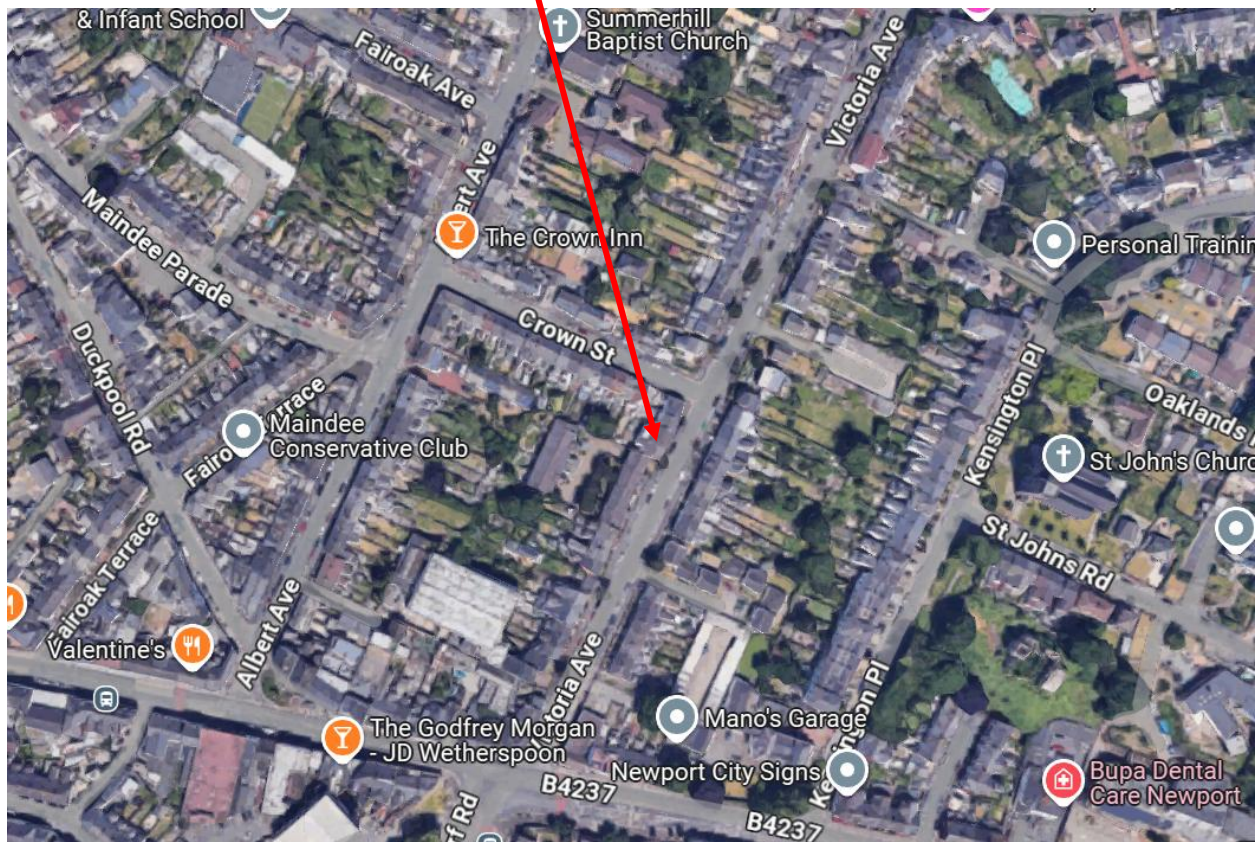
- 1.1 This Planning Statement has been prepared by LRJ Planning Ltd on behalf of Wild Meadow Property Ltd to accompany the full planning application at 19 Victoria Avenue, Newport from a four bedroom house in multiple occupation (C4 use) to a six bedroom house in multiple occupation (C4 use). The original planning permission (planning reference: 19/0006) restricted the number of bedrooms to four.
- 1.2 This Planning Statement describes the proposals, related key material considerations in determining the application, and benefits which will be delivered. Furthermore it reviews and demonstrates compliance with the approved relevant development plan policies and national planning policy.
- 1.3 This statement should be read in conjunction with the following plans and documents that accompany the application and comprise:
- Application form and certificates;
 - Site location plan; and
 - Existing and proposed floor plans.

2.0 Site Description

- 2.1 The application site comprises a two-storey terraced property (three-storey at the rear), which is surrounded by properties of a similar vintage. The property itself consists of an existing four bedroom house in multiple occupation (C4 use) arranged over three levels that is positioned on the western side of Victoria Avenue. The property benefits from a rear garden area.



Figure 1 – Aerial photograph of application site



2.2 The property occupies a sustainable location within the settlement boundary, as well as being within walking distance of a bus route with regular services. Within 800m there are a raft of amenities and services, as well as the Maindee District Centre.



3.0 Planning Designations

- 3.1 The Site is not subject to any designations as defined by the Council's adopted Policies Map.
- 3.2 The Site is not within, or immediately adjacent to, designations for valued landscapes, such as local landscape designations, AONBs or National Parks.
- 3.3 There are no designated heritage assets within the vicinity of the site.

4.0 Proposal

- 4.1 Full planning permission is sought for the use of the property as six bedroom house of multiple occupation (C4 use). The property is currently a lawful 4 bedroom house in multiple occupation. Condition 2 of planning permission reference: 19/0006 states:

"2. The property shall have a maximum of 4no bedrooms. Reason: To protect the amenity of adjoining occupiers and in the interests of highway safety."

- 4.2 The accommodation will be arranged as follows:

- Lower Ground Floor – Communal kitchen/living/dining area, bedroom and shower room;
- Ground floor – Three bedrooms (one with en-suite)
- First floor – Two bedrooms (one with en-suite) and shower room.

5.0 Planning Policy Context

- 5.1 The planning policy framework for the determination of this application is provided by the content and scope of National Planning Policy, which is contained within the Wales Spatial Plan, Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the Development Plan for the local area.

Planning Policy Wales



5.2 PPW identifies that as part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs) and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement. PPW adds that:

“A broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor’s surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.”

Development Plan

5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

5.4 Part 2 (Sustainable Development) of the Planning (Wales) Act 2015 says the following:

1. *This section applies to the exercise by the Welsh Ministers, a local planning authority in Wales or any other public body—*



(a) of a function under Part 6 of PCPA 2004 in relation to the National Development Framework for Wales, a strategic development plan or a local development plan;

(b) of a function under Part 3 of TCPA 1990 in relation to an application for planning permission made (or proposed to be made) to the Welsh Ministers or to a local planning authority in Wales.

2. The function must be exercised, as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015 for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.

5.5 The Newport Local Development Plan (LDP) to 2015 is the development plan for the purposes of the Planning and Compulsory Purchase Act 2004. The relevant polices are referred to below.

- SP1 Sustainability;
- GP2 General Amenity;
- GP4 Highways and Accessibility;
- H8 Self Contained Accommodation and Houses in Multiple Occupation; and
- T4 Parking.

5.6 The Council's Supplementary Planning Guidance for Houses in Multiple Occupation (2016) offers further guidance in respect of the proportion of HMOs within a 50m radius not exceeding 15%.



6.0 Planning Appraisal

6.1 This section seeks to highlight the main issues relevant to the determination of the application and assess the scheme against the local and national planning policies referenced in section 5.0 above.

6.2 The main issues that are considered to be relevant in this case include:

- The principle of development in relation to land use planning policy and sustainable development;
- The effect the proposal will have on the character and appearance of the area;
- The impact on the amenity of neighbouring properties;
- Parking and servicing arrangements.

i) Principle of Development

6.3 Both local and national planning policy supports the provision of sustainable development and promotes the provision of development within the defined urban boundary. Policy SP1 of the LDP seek the efficient use of land within the urban boundary and there is a presumption in favour of sustainable development, subject to other material considerations.

6.4 Policy H8 of the LDP identifies that:

“Within the defined settlement boundaries, proposals to subdivide a property into self contained accommodation, bedsits or a house in multiple occupation will only be permitted if:

- i) the scale and intensity of use does not harm the character of the building and locality and will not cause an unacceptable reduction in the amenity of neighbouring occupiers or result in on street parking problems;*



- ii) *the proposal does not create an over concentration of houses in multiple occupation in any one area of the city which would change the character of the neighbourhood or create an imbalance in the housing stock;*
- iii) *adequate noise insulation is provided;*
- iv) *adequate amenity for future occupiers.”*

6.5 The Council’s Supplementary Planning Guidance (SPG) establishes a policy framework for assessing planning applications concerning Houses in Multiple Occupation (HMOs). Specifically, the SPG stipulates that proposals will not be supported if they result in the proportion of HMOs within a defined radius exceeding a specified threshold. In this instance, the applicable threshold is set at 15% within a 50-metre radius of the application site. A detailed assessment of the existing distribution of HMOs within the vicinity confirms that the proposed development remains within this prescribed limit, given that it is a current lawful HMO (C4 use). The only change is to increase the number of bedrooms, as the original planning permission restricted this, thereby ensuring compliance with the Council’s adopted SPG.

6.6 Furthermore, the proposal is aligned with Policy H8 of the Local Development Plan (LDP), which seeks to manage the spatial distribution of HMOs to prevent an undue concentration that could compromise community cohesion, housing mix, or local amenity. The adherence to the 15% cap serves as a key determinant in demonstrating that the proposal will not result in an excessive proliferation of HMOs in the immediate locality. Accordingly, the principle of the proposed development is considered to be acceptable, subject to an evaluation of other material planning considerations, which are discussed in the subsequent sections.



ii) Character and Appearance

6.7 Policy GP2 of the Local Development Plan (LDP) establishes a fundamental requirement for high-quality design in new development. It emphasises that proposals must demonstrate a clear understanding of, and responsiveness to, the character and context of both the natural and built environment. The policy advocates for development that reinforces local distinctiveness through considered architectural design, appropriate scale and massing, and the careful selection of materials that respect and complement the prevailing character of the area. By doing so, Policy GP2 seeks to ensure that new development contributes positively to the townscape, supports sustainable placemaking, and enhances the overall quality of the built environment.

6.8 The proposed development does not entail any external alterations to the existing building. As a result, the established architectural character, visual integrity, and appearance of the surrounding area will be preserved. The absence of physical modifications ensures that the proposal remains entirely in keeping with the existing streetscape and does not introduce any visual intrusion or discordant elements. This approach aligns with the overarching objectives of Policy GP2, which prioritises contextually appropriate design solutions that uphold and enhance the character of the local area.

iii) Neighbour Amenity

6.9 Policies GP2 and H8 of the Local Development Plan (LDP) are designed to safeguard the amenity of existing residents by ensuring that new developments, including changes of use, do not result in any adverse impacts on neighbouring properties. These policies require that proposals be assessed in terms of their potential to generate noise, disturbance, or other forms of disruption that could detract from the quality of life of surrounding occupiers. The overarching objective



is to balance the provision of diverse housing options, such as HMOs, with the need to maintain a high standard of residential amenity within established communities.

6.10 The application site is situated within a dense urban environment characterised by a fine-grain pattern of development, with properties in close proximity to one another and benefitting from access to a wide range of local services and amenities. Given this context, there is no substantive evidence to suggest that the proposed use of the property as a 6 bedroom HMO instead of a 4 bedroom HMO would result in any material harm to the amenity of neighbouring occupiers. The scale and intensity of the proposed use are proportionate to the size of the property, ensuring that it can function effectively as an HMO without giving rise to excessive noise, disturbance, or other amenity-related concerns. Moreover, the nature of the surrounding area, which already accommodates a mix of residential and commercial uses, further supports the conclusion that the proposal is compatible with its setting.

6.11 In light of the above considerations, it is evident that the proposed development would not result in any material harm to the amenity of neighbouring properties. As such, the scheme accords fully with Policies GP2 and H8 of the LDP, which seek to ensure that residential developments, including HMOs, integrate harmoniously within their respective contexts while maintaining an acceptable standard of amenity for both future and existing occupiers.

iv) Parking and Servicing

6.12 The existing lawful use of the property as a four bedroom house in multiple occupation (C4 use) offers no off street parking provision. In accordance with the Council's SPG the existing parking demand generated is 5 spaces. With regards



to the proposed use of the property as an HMO (C4 use), in accordance with the Council's SPG the shortfall in parking demand is 2 spaces. The property occupies a highly sustainable location within walking distance from services and amenities, as well as public modes of public transport. Given the nature of the proposed use, the occupants are less likely to have cars. Critically the proposed use would not result in a need for off-street parking to be provided. However, the Parking Survey provided demonstrates that even at times of peak demand that sufficient on street parking is available.

- 6.13 The property is located in a highly sustainable location. This is based on the fact that as stipulated in paragraph 4.4.1 of Manual for Streets (MfS), walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas, which residents may access comfortably on foot. It is recognised that this is not an upper limit and PPS134 states that walking offers the greatest potential to replace short car trips, particularly those under 2km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.
- 6.14 The property is located within 100 metres of Maindee District Centre. As a result, occupants will enjoy easy access to shops, services and facilities as well as local employment opportunities, therefore reducing the reliance on the private car. This accords with the overarching pursuit of sustainable development set out in Planning Policy Wales. Given the proximity to a range of local services, the absence of off-street parking is fully justified for an HMO.
- 6.15 There have been a plethora of appeal decisions where a parking survey had been submitted and in all cases except, the Inspectors accepted that the availability of on-street parking meant that there would not be a harmful impact on highway and pedestrian safety. Further to this and crucially in all cases, the Inspectors attached significant weight to the sustainability of the sites.



6.16 Inspectors have set out that there is no reason for HMOs to be exempt from consideration of their sustainability credentials. In a significant number of appeal decisions, it has been concluded that they were located in sustainable locations and Inspectors have considered the aims of Planning Policy Wales which states that “parking standards should be applied flexibly and informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car.” Inspectors consider that HMOs represent a form of development which would be an attractive form of accommodation to those without regular access to a private car. Inspectors consider that HMOs are unlikely to generate the demand for on-street parking as recommended by the Parking Standards SPG.

Sustainable Transport Hierarchy



6.17 Finally, Llwybr Newydd: the Wales transport strategy 2021 prioritises bringing services to people to reduce the need to travel; enable easy movement of people and goods through accessible, sustainable and efficient transport services and infrastructure; and encouraging people to transition towards using sustainable transport. The proposal aligns with this and promotes the use of walking and cycling.

6.18 Overall, due to the proximity of the property to a range of local amenities and services that are within 800m, which is within an easy walking distance the



absence of off-street parking is fully justified. Future occupants will be attracted to the property by virtue of its proximity to good public transport links, as well as the District Centre. Accordingly, the proposal is compliant with Policies GP4 and H8 of the LDP.

7.0 Conclusion

- 7.1 As outlined throughout this Planning Statement, the application site is situated within a highly sustainable and well-established residential area. The proposed development would contribute to the provision of a diverse housing mix, addressing local demand and catering to the varied needs of the community. The increase in the occupation of this lawful HMO (C4 use) from four bedrooms to six bedrooms at this location aligns with strategic housing objectives by optimising the use of existing housing stock and supporting a balanced and inclusive residential environment.
- 7.2 While the property does not benefit from dedicated off-street parking, its location within 800 metres of a range of local amenities, services, and sustainable transport options provides strong justification for the absence of parking provision. The site is well-served by public transport links, which reduce reliance on private car ownership and encourage the use of more sustainable modes of travel in accordance with national and local transport policies. Furthermore, the proposal includes a private rear amenity space, which provides sufficient capacity for essential facilities such as bin and bicycle storage, as well as a washing line, ensuring that the development meets functional living standards and contributes to environmental sustainability.
- 7.3 This Planning Statement has comprehensively demonstrated that the proposed development accords with both national and local planning policy objectives. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004,



planning applications must be determined in accordance with the adopted development plan unless material considerations indicate otherwise. Given that the proposal complies with the relevant policies and does not give rise to any significant adverse impacts, there are no justifiable reasons to withhold planning permission. Accordingly, it is respectfully requested that the application be approved.