



**LRJ PLANNING**

Planning, Design and Development

# **PLANNING STATEMENT**

**PROPOSAL: CHANGE OF USE FROM A 4 BEDROOM DWELLING (C3 USE) TO A 4 BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE)**

**CLIENT: MR GRAINGER JONES**

**SITE: 35 LISCOMBE STREET, NEWPORT, NP19 0HQ**

**DATE: MAY 2025**



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## **1.0 Introduction**

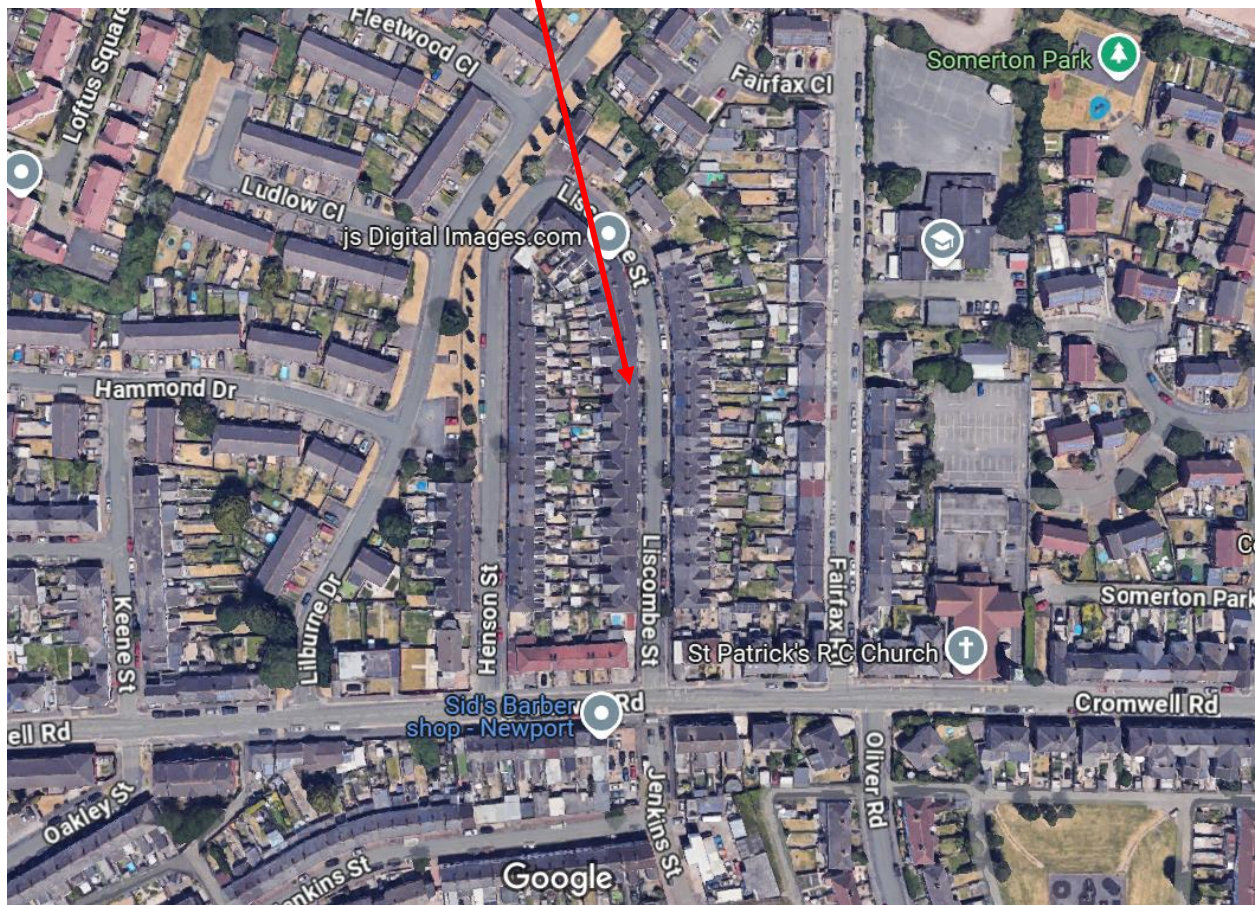
- 1.1 This Planning Statement has been prepared by LRJ Planning Ltd to accompany the full planning application for the change of the use of 35 Liscombe Street, Newport from a four bedroom dwelling to a four bedroom house in multiple occupation (C4 use).
- 1.2 This Planning Statement describes the proposals, 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, which is surrounded by properties of a similar vintage. The property itself consists of an existing four bedroom dwelling that is positioned on the western side of Liscombe Street. 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.

### **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.



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## **4.0 Proposal**

4.1 Full planning permission is sought for the change of the use of the property to create a four bedroom house of multiple occupation (C4 use). A communal living/kitchen area at ground floor is proposed.

## **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 policies are referred to below.

- SP1 Sustainability;
- SP3 Flood Risk;
- 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 10%.

## **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.
- Flood risk

**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 SPG advises that planning applications will not be supported where it would take the proportion of HMOs within a 50m radius of the application building above a specified limit. In this case the limit is 10% and the proposal satisfies this 10% threshold. As a result, the proposal accords with Policy H8 of the LDP and the 10% threshold prescribed in the Council’s SPG. The proposal will not result in



an over concentration of HMOs within the area. Given this position the principle of the proposed development is acceptable, subject to the other material considerations that will be discussed below.

## **ii) Character and Appearance**

6.6 Policy GP2 of the LDP emphasises the importance of high-quality design, requiring new developments to carefully consider their surroundings, both natural and built. It encourages designs that respect local character and utilise materials that blend harmoniously with the area.

6.7 This proposal does not include any external alterations, ensuring that the existing character and visual appeal of the area remain unchanged.

## **iii) Neighbour Amenity**

6.8 Policy GP2 and H8 of the LDP seeks to ensure that proposals would not have a detrimental impact on the amenity of neighbouring properties.

6.9 The surrounding area is urban and built up with tight grain development close to a raft of local amenities. There is no evidence to suggest that the use of the property as an HMO would have any impact on neighbour amenity. The proposed use is commensurate to the size of the property, and would not undermine the amenity of the neighbouring properties, through any increase in noise and disturbance.

6.10 Overall, the proposal would not materially harm the amenity of neighbouring properties and therefore accords with Policies GP2 and H8 of the LDP.



#### **iv) Parking and Sustainable Location Considerations**

- 6.11 The lawful use of the property as a four bedroom dwelling does not currently benefit from any off-street parking provision. In accordance with the Council's Supplementary Planning Guidance (SPG), the existing demand for parking generated by the property is assessed at three spaces. Similarly, under the proposed change of use to a House in Multiple Occupation (HMO) (Use Class C4), the calculated shortfall in parking demand remains at three spaces. However, the property is strategically positioned within a highly sustainable urban environment, offering immediate accessibility to a wide range of local services, amenities, and well-integrated public transport links. Given the demographic profile typically associated with HMO occupancy, residents are demonstrably less reliant on private vehicle ownership. Consequently, the proposed use does not necessitate the provision of off-street parking. Furthermore, the accompanying Parking Survey substantiates that, even during peak demand periods, adequate on-street parking capacity is available to accommodate any potential overspill without causing material harm to highway safety or residential amenity.
- 6.12 The property is located within what is demonstrably a highly sustainable setting. This conclusion is reinforced by the guidance set out in paragraph 4.4.1 of Manual for Streets (MfS), which defines walkable neighbourhoods as areas where key facilities and services are accessible within a 10-minute walking radius (approximately 800 metres) of residential dwellings. The overarching guidance in MfS advocates for a planning approach that actively reduces dependency on private vehicles by fostering the development of mixed-use, interconnected neighbourhoods where essential services are accessible on foot.
- 6.13 The sustainability credentials of the site are further underscored by its proximity to essential amenities, employment opportunities, and public transport networks. The resultant accessibility minimises the necessity for private car ownership, thereby



aligning with the fundamental tenets of sustainable development, as set out in Planning Policy Wales. In this context, the absence of off-street parking is fully justified, as future occupants will benefit from the availability of alternative, more sustainable modes of transport.

- 6.14 Empirical evidence from numerous appeal decisions further supports this position. In cases where parking surveys have been submitted, Inspectors have overwhelmingly determined that the availability of on-street parking mitigates any adverse impact on highway and pedestrian safety. More significantly, Inspectors have consistently assigned considerable weight to the sustainability of such sites, recognising that their strategic location obviates the necessity for additional parking provision.
- 6.15 The principle that HMOs should be subject to the same sustainability considerations as other residential developments has been firmly established in precedent appeal decisions. Inspectors have routinely acknowledged that HMOs, by their very nature, are attractive to individuals who are less reliant on private vehicles. This aligns with the objectives of Planning Policy Wales, which stipulates that parking standards must be applied flexibly and in a manner informed by local context, public transport accessibility, urban design principles, and the overarching imperative to reduce car dependency. As such, the assumption that HMOs will generate the same level of parking demand as conventional dwellings is not borne out by evidence.



## **Sustainable Transport Hierarchy**

- 6.16 The proposal aligns with the policy objectives set out in Llwybr Newydd: The Wales Transport Strategy 2021, which prioritises reducing the necessity for travel by bringing services closer to people, improving the accessibility and efficiency of sustainable transport infrastructure, and encouraging a modal shift towards active travel. The development proposal actively facilitates these objectives by promoting walking and cycling as viable transport options for future occupants.
- 6.17 In summary, the property's strategic location within 800 metres of a comprehensive range of essential services and public transport links fully justifies the absence of off-street parking. The proposal, therefore, accords with the policy framework established under Policies GP4 and H8 of the Local Development Plan (LDP), reinforcing the principle that developments within sustainable locations should be supported.

### **v) Flood Risk Considerations**

- 6.18 The site is situated within Flood Zone 3 and no bedrooms are proposed at ground floor. Accordingly, the proposed conversion to an HMO does not introduce any additional flood risk beyond the current baseline. The Flood Consequences Assessment submitted in support of the application confirms that the associated flood risk remains within acceptable parameters.



## **7.0 Conclusion**

- 7.1 As evidenced throughout this Planning Statement, the site is situated within a highly sustainable and established residential area. The proposed development would contribute to the diversification of housing stock, addressing identified local housing needs and supporting the broader objectives of community inclusivity and housing accessibility.
- 7.2 While the property does not benefit from dedicated off-street parking, its location within 800 metres of essential local amenities and services fully justifies the absence of such provision. Moreover, the proposal includes a private rear amenity space, ensuring adequate facilities for household necessities such as a washing line, as well as designated areas for bin and bicycle storage, thereby enhancing the scheme's functionality and sustainability.
- 7.3 This Statement has comprehensively demonstrated that the proposed development accords with both national and local planning policies. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning determinations must be made in line with the adopted development plan unless material considerations dictate otherwise. Given the proposal's clear compliance with the relevant policy framework, it is respectfully submitted that planning permission should be granted.