

HarveyBowes[®]

GROUP

Planning Statement



Proposed Development: Change of use and subdivision of existing residential unit (Use Class C3) to form two self-contained apartments (Use Class C3).

Client: BW3 Estates Limited

Site Address: 133 Stow Hill, Newport, NP20 4FZ

Applicant: Howard Bowes, Harvey Bowes Group Limited

Date: 21 May 2025

Table of Contents

1. Introduction	3
2. Site and Surroundings	3
3. Planning Designations	5
4. The Proposal	5
5. Planning Policy Context	6
6. Development Plan	6
7. Design and Layout	7
8. Planning Appraisal	8
9. Noise Mitigation Measures	15
10. Residential Amenity	15
11. Conclusion	16

1. Introduction

- 1.1. This Planning Statement has been prepared to support a full planning application for the proposed change of use and subdivision of an existing residential dwelling into two self-contained apartments at the above address. The application seeks to provide two high-quality, independent residential units within the existing building envelope, in a manner that aligns with national and local planning policies.
- 1.2. The proposal aims to provide an efficient use of the existing residential property, delivering an additional dwelling unit without the need for significant external alterations. The scheme contributes to the local housing supply and offers accommodation suitable for smaller households. Furthermore, it reviews and demonstrates compliance with the approved relevant development plan policies set out by Newport City Council and national planning policies.
- 1.3. The statement should be read in conjunction with the following plans and documents that accompany the application and comprise:
 - 1.3.1. Application form and certificates;
 - 1.3.2. Site location plans;
 - 1.3.3. Existing and proposed floor plans, including elevations;
 - 1.3.4. Parking survey adopting Lambeth Methodology;
 - 1.3.5. Green infrastructure statement;
- 1.4. Please note that a SAB application has not been submitted. Legislation required this where exterior works extend the building by 100 square meters or more. In this instance, the development is entirely within the foot print of the existing building and do not trigger a SAB application requirement.
- 1.5. Further to a previous application 24/0948 the Newport City Council ecology officer reasoned that since there are no exterior changes to the building at all, including but not limited to the elevations and roof, a bat report would not be required. As such, a bat report has not been included with this application.

2. Site and Surroundings

- 2.1. The application site comprises a three-storey mid-terraced semi-commercial and residential property currently a disused commercial (retail) unit to the ground floor and a single-family dwelling (Use Class C3) to the first and second floors. The building has been derelict and uninhabited for more than seven years and purchased by the current owners in 2024 from auction with the intention to bring the property back to useful purpose.
- 2.2. The property is surrounded by a mix of residential and commercial property, with nearby commercial properties, including but not limited to, a petrol station, St. Woolos Hospital and lies in close proximity to St. Woolos Cathedral. In addition, there is a cluster of commercial properties that surround the property. The property is conveniently located to access both the city centre to the north-east and Handbury shopping district to the west.



The property features an existing commercial unit to the ground floor which will remain commercial and a 12-room residential building spread across the upper floors. While the property lacks a large rear garden, there is a courtyard and car-port style area that will facilitate an excellent space for amenity, bin and bikes stores. The area provided by the courtyard is sufficient to provide a bin store and bike store that meet Newport City Council standards for such and additional space for the benefit of the future occupants.

Furthermore, the property benefits from two dedicated parking spaces which are to the rear of the property and accessed by a private lane. In addition, its location provides numerous street parking opportunities with good availability as supported by the Lambeth Methodology report including with this planning application. Being located close to the city centre and on the main Stow Hill road, there are also excellent transport links being located on a main trunk road from the city centre to the west and towards the m4 at junction 27 and Cardiff beyond. Additionally, the property is conveniently located close to essential amenities, reducing the reliance on a car as private transport. Our scheme will discourage car use.

Importantly, in respect of planning application 24/0948 for the subject property to be changed to a five bed HMO, Highway Response confirmed that since the property is a three-bed residential dwelling, it is assumed that three parking spaces already exist (in terms of policy and not necessarily actually) and therefore as a five bed HMO an additional two spaces locally would be required. It was considered there was capacity for this, and highways sited no objection to the proposal. The new property hereby

submitted, proposes the change of use to two self-contained apartments which in total will have three bedrooms as per the existing dwelling and we are therefore fully satisfied that highway requirements are satisfactory.

- 2.3. The property occupies a sustainable location within the settlement boundary, as well as being within walking distance of a bus route. It is also near the mainline train station with regular services, and Newport City Centre. Nearby the property, there are a wide range of amenities and services that are accessible within the City Centre.

3. Planning Designations

The site is not subject to any designations as defined by the Council's adopted policies map, save as to being a conservation area as referred to below.

The site is not within, or immediately adjacent to, designations for valued landscapes, such as local landscape designations, AONBs or National Parks

There are no designated heritage assets within the vicinity of the site.

The site is designated as a conservation area, considered to be a special area of architectural or historic interest, and the council intend to preserve or enhance the character of the area.

Being in a conservation area, the proposal does not include any alterations to the exterior of the building, including most notably the front façade and further proposes to retain existing sash windows, plant boxes and other features that are distinctive and characteristic of the building and its heritage. The proposal also takes into account the Grade II listed Stow Hill Railway Tunnel, ensuring that it will not be impacted.

The building has been vacant for more than 7 years and falling into disrepair. Restoration of the residential as a single dwelling is not financially viable with recent cost increases and furthermore, there is greater demand for smaller households. Therefore, the proposal will bring this building back to a restored state and beneficial use to the housing demand that existing in the local community.

4. The Proposal

The proposed development involves the conversion of the existing single dwelling into two self-contained apartments, both falling within Use Class C3. The internal layout will be reconfigured to accommodate one apartment on the first floor and another on the second floor, with the commercial on the ground floor to remain as existing. Each apartment will include:

- Independent access arrangements, separate entrance for the residential to the commercial
- Entirely self-contained apartments with private kitchens and bathrooms
- Adequate internal living space in line with national size guidelines

The overall accommodation as follows:

- Cellar (part of commercial retail unit & only for landlord use)
- Ground floor – bin and bike store (to include electrical charging points)
- (Ground floor – commercial to remain as such, formerly operated as hairdresser)
- First floor – two-bedroom apartment
- Second floor – one-bedroom apartment

Consideration has been made to the period features, look and feel of the building. In addition, the property lies in a conservation area and therefore no external alterations are proposed to building, with conversion works being internal only. Waste storage and cycle parking will be accommodated in a manner that does not adversely affect the street scene.

A refuse and recycling area will be situated on the ground floor at the rear of the property, accessible only to residents. This space will be self-contained and designed to promote recycling. The waste management setup will include a 120L bin, a blue, green, and red box/bag for recycling, and an external food caddy for food waste disposal.

5. 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 (11th Edition)

PPW highlights that when evaluating housing delivery options, planning authorities should assess the potential contributions of various housing market sectors and builders in meeting housing needs. In site allocation, authorities must ensure a range of sustainable and achievable sites, allowing all types of builders—including national and regional developers, registered social landlords (RSLs), small and medium-sized enterprises (SMEs), and the custom and self-build sector—to play a role in fulfilling the housing requirements.

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.”

6. Development Plan

6.1. 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.”

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 wellbeing of Wales.

6.2. 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;
- GP2 General Amenity
- GP4 Highways and Accessibility
- H8 Self Contained Accommodation and Houses in Multiple Occupation; and
- T4 Parking.

7. Design and Layout

The internal configuration of the property will be altered to create two separate units. Each apartment will have its own area for living space, kitchen, bathroom, and bedroom(s). Careful attention has been given to natural light, ventilation, and acoustic separation between the units.

The proposed apartment sizes, in square meters:

First floor flat: 56.34

Second floor flat: 42.41

Newport City Council policy states that the relevant “*desired standard*” for gross internal floor space in a converted flat should be 58 square meters for a two bed and 45 for a two bed. The intended design for the one-bedroom flat is for one person occupation and will be fitted with a shower and not a bath for maximum usable space.

The proposed apartments therefore fall slightly short of the *desired standard*; however, the building is situated in a conservation area and being landlocked, an extension is neither practically possible, sympathetic to conservation policy or financially viable.

Newport City Council Supplementary Planning Guidance for Flat Conversions (February 2019) states 1.3.1 This SPG has three main functions, with iii being to “protect the character and appearance of the built environment”. In keeping with this and the conversation area of Stow Hill, the proposed development affords consideration to these matters with a small compromise to the desired standard for gross internal floor space.

The policy also states 4.5.1: when assessing a development proposal in a conservation area, the council has a duty to pay special attention to the desirability of preserving or enhancing the character and appearance. By taking a sympathetic and compliant view of this policy and keeping the development within the building itself and not proposing external changes, the building maintains it’s character which is in keeping with the area of interest.

Living conditions can be considered in keeping with 5.2.1 which states that a converted flat should offer it’s occupants reasonable levels/amounts of natural light, perceived space, privacy, ventilation, peace and quiet and noise attenuation. And also sites cycle storage and bin/recycling storage as desired features.

All of the aforementioned matters are carefully considered and incorporated into the proposed design. Details of which are documented within the planning application and associated documents, including, but not limited to the internal glazing proposal which provides ventilation and noise mitigation, leading to peace, quiet and noise attenuation. Natural light is attained by the existing large windows and perceived space is provided by the generous size of rooms and the tall ceilings which give a greater feeling of light and space.

Furthermore, due to being in a conversation area, the prospect of altering the exterior of the building would have a negative impact on the conservation and protection of the architectural and heritage aspects of the area.

The proposal maintains the buildings original exterior footprint with no alterations to the elevations, or window apertures. No additional windows are proposed, and all rooms benefit from natural light. Furthermore, the existing windows, do not infringe on the privacy of the neighbouring buildings.

The apartments benefit from tall ceilings as is the nature of this building and give a quality feeling of space and light that will provide good quality living accommodation for the occupants.

No significant changes are proposed to the external appearance of the building, thereby preserving the visual character of the street. Waste and recycling storage areas will be located discreetly, and bicycle storage will be provided in accordance with local policy.

8. Planning Appraisal

8.1. 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 and 6 above.

8.2. 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,

8.2.1.Principle of Development

8.2.1.1. 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.

8.2.1.2. Policy H8 of the LDP identifies that:

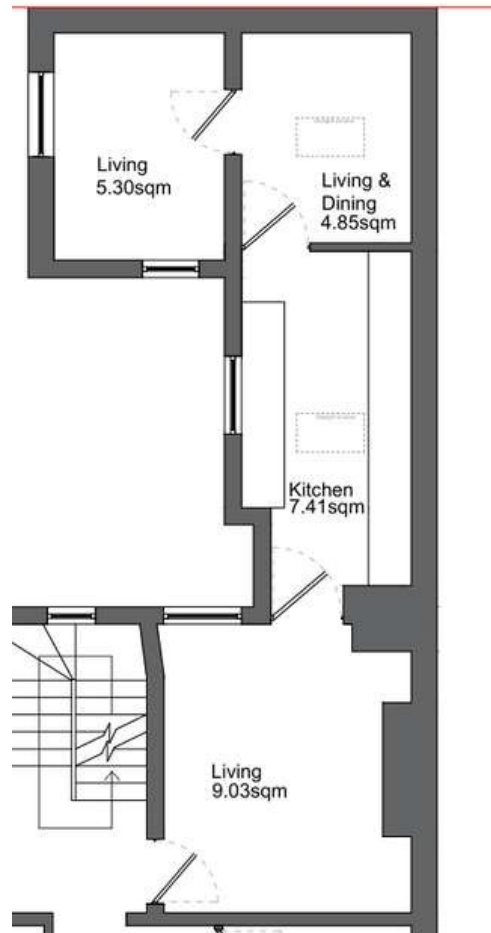
“Within the defined settlement boundaries, proposals to subdivide a property into self-contained accommodation, bedsits or a house in multiple occupation will only be permitted if:

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.”

8.2.2.Character and Appearance

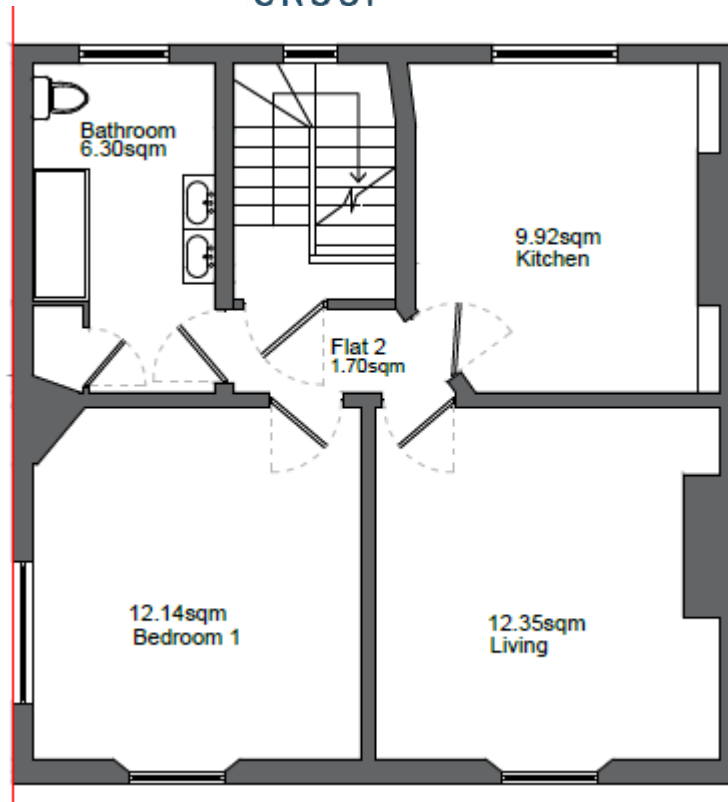
8.2.2.1. Policy GP2 of the LDP seeks to promote good design and that new development must have full regard to the context of the local natural and built environment, and promotes the use of local distinctiveness through sympathetic design and material selection.

8.2.2.2. The proposed use will not significantly change the character of the area. Furthermore, as there are no external modifications planned, the character and appearance of the property and the surrounding street scene will be preserved. Policy H8 has been carefully reviewed in light of the property’s location within a conservation area. Consequently, no alterations will be made to the existing windows; all proposed bedrooms will utilise the current windows without adding any new ones, ensuring that none impact the privacy of neighbouring properties. Energy efficiency will be enhanced through internal glazing, while the existing wooden sash windows are retained.



Floor plan snippet showing the kitchen and living areas, including skylight windows.

- 8.2.2.3. In respect of the first floor flat, the use of the space as designed creates functional living and kitchen area while having separation of the living areas to provide versatile accommodation. This will lend well to a good standard of living for occupants who will benefit from a good sized area of 9.03sqm as “seating/lounge”, 4.85sqm meters as a “dining” area and 5.03sqm as a “snug” or “home-office”. Intended uses will be the decision of the occupant and although these living arrangements are proposed as a concept, the occupant has the versatility to arrange accommodation in keeping with their requirements.
- 8.2.2.4. the second-floor apartment is proposed as a one bed and functionally designed within the space parameters available. The living space is 12.35sqm and bedroom 12.14sqm, providing excellent size rooms suitable for modern living and providing quality accommodation for the occupants. The bathroom is 6.3sqm which is of adequate size to house a generous cupboard as shown in the drawings in addition to a shower, w/c and sink and vanity units that will provide generous storage.



- 8.2.2.5. The development recognises the need for noise insulation, particularly between ceiling of the ground floor commercial unit and the floor of the first-floor apartment. This will be achieved through construction fully compliant with building regulations, including the use of appropriate glazing to ensure the proposal meets all amenity standards. In addition, fire protection and detection systems will be installed. Although the glazing will meet these requirements, it will not alter the building's exterior aesthetic, which must remain unchanged due to its location within a conservation area.
- 8.2.2.6. It's important to note that a clear separation will be created between the commercial and residential units, ensuring each is entirely self-contained, as illustrated in the figure below. The commercial unit's cellar, accessible from the exterior courtyard, will be designated for landlord use only.

This development fully respects Policy H8.



Separation between residential and commercial



Entrance to cellar from designated commercial area, locked and for Landlord use only

8.2.3. Neighbour Amenity

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

8.2.3.2. The location of the property is characterised by a mix of residential and commercial properties, particularly along Stow Hill itself. Given the established nature of the neighbourhood and the presence of various housing types, the conversion of the upper floors into self-contained apartments is in keeping with the local character. The property is currently listed as a three-bedroom maisonette and as such, the conversion to two self-contained apartments, one with one-bedroom and one with two-bedrooms does not increase the occupancy level from that previously assumed.

8.2.3.3. The retention of the ground-floor retail unit ensures that the mixed-use character of Stow Hill is maintained, with minimal impact on neighbouring properties in terms of noise and disruption, while continuing to contribute to the local community.

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

8.2.4. Parking and Servicing

8.2.4.1. The property's current lawful use as a mixed-use building includes two off-street parking spaces. These two spaces will remain allocated for the proposed two self-contained apartments.

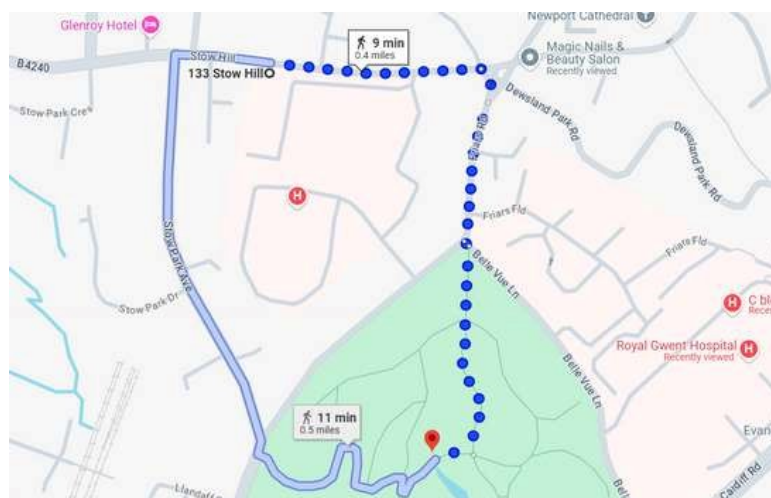
8.2.4.2. As per the Council's SPG, the parking requirement is one space per bedroom. Highways policy would assume that three spaces are already available due to being a three-bedroom property already, therefore, there is no material shortfall in parking facilities.

- 8.2.4.3. Despite this, we have considered the real and actual impact: while only two spaces are available, the property's sustainable location—within easy reach of amenities and public transport—should make these spaces sufficient. Additionally, the target tenants are likely to be working professionals, single occupancy for the one-bedroom apartment and single professional with young or younger teenage dependant for the two-bedroom apartment. Furthermore, the versatility of the accommodation of the two-bedroom first floor apartment does facilitate the work-from-home trend further reduces parking demand. The parking survey also indicates that alternative spaces are available nearby. Furthermore, contact with Newport Parking Services has confirmed that 133 Stow Hill is not part of a Resident Parking scheme.
- 8.2.4.4. In the pre-planning response to a former application (for five-bedroom HMO) the highways officer noted that the two parking spaces cannot be accepted due to a lack of pedestrian visibility at the entrance. However, it appears that the officer's inspection may not have fully considered the actual location of the parking spaces, which are situated at the rear of the property, next to the neighbouring residence's parking. While nearby streets have some restricted parking, there are still open parking spaces on Brynyfryd Road, Caerau Road, and Stow Park Circle.
- 8.2.4.5. Additionally, we are fully supportive of the officer's suggestion to reinstate a level footway and remove the dropped curb. See below for photographic evidence of the existing curb. These double doors that form the frontage of the covered car port area will not be used for vehicle access and will be the exit for bikes, bins and recycling only. In any event, the opening is not sufficiently wide enough for many modern cars.



Curb outside the property

- 8.2.4.6. The property is situated in a highly sustainable location. According to paragraph 4.4.1 of the Manual for Streets (MfS), walkable neighbourhoods are typically defined by having a variety of facilities within a 10-minute (approximately 800 meters) walk from residential areas, allowing residents to easily access these amenities on foot. While this is a general guideline, PPS134 emphasizes that walking is particularly effective in replacing short car trips, especially those under 2km. MfS advocates for reducing the need for car travel by developing mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance for most residents.
- 8.2.4.7. The property is located just 0.6 miles from the City Centre, offering residents convenient access to shops, services, public transport, and employment opportunities, reducing the need for private car use and supporting sustainable development principles outlined in Planning Policy Wales. The property is also just 200 yards from St Woolos Hospital and within a mile's walk of the Royal Gwent Hospital, both key workplaces for professional tenants in Newport, making it attractive to prospective tenants while supporting the local hospital and surrounding businesses. In addition, residents benefit from nearby amenities, including restaurants, pubs, retail, and convenience shops—all within walking distance. The City Centre itself is also easily accessible on foot or by bus, with four routes conveniently stopping right outside the property.
- 8.2.4.8. As illustrated in the figure below, the property is just 0.4 miles, or a 9-minute walk, from the nearest local park, Belle Vue Park. Clifton Park is almost exactly the same distance away providing another alternative. Belle Vue park is the larger, with both parks being well-maintained by the council and as assets to the local public. They provide welcoming alternatives to onsite amenity space. While the property lacks its own outdoor green space, the location offers plenty of nearby alternatives to support the proposal, giving residents the convenience of visiting a local park on foot.



Map from 133 Stow Hill to Belle Vue Park

- 8.2.4.9. There have been numerous appeal decisions involving parking surveys, and in most cases, inspectors accepted that the availability of on-street parking would not negatively impact highway or pedestrian safety. Importantly, in every case, the inspectors placed significant emphasis on the sustainability of the site. In this instance, the submitted parking survey demonstrates that the location's sustainability significantly reduces the need for a car, supporting the argument that off-street parking is not necessary, although two spaces are available.
- 8.2.4.10. Overall, the property's close proximity to a variety of local amenities and services, all within easy walking distance, fully justifies the absence of off-street parking. Future occupants will be drawn to the property due to its public transport links, proximity to the City Centre, and access to the mainline train station. Therefore, the proposal complies with Policies GP4 and H8 of the LDP.
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9. Noise Mitigation Measures

- 9.1. It is accepted that the property is currently a mixed use commercial and residential property. With commercial to the ground floor and a residential dwelling above. This is long standing and in principle, with the proposed two self-contained apartments resulting in the same number of bedrooms (three), will remain the same. However, as a betterment, the following noise mitigation measures will be implemented to facilitate an enhanced and good quality living experience for the occupiers:
- 9.1.1. Internal additional glazing will be installed to the front of the property. This will not have any impact on the exterior thereby respecting the buildings character and maintaining the street scene which is in keeping with the conservation area in which the building is situated, however, it will provide greater energy efficiency and service for noise reduction for occupiers.
- 9.1.2. Between the commercial and residential element, it is intended to install 'Mass-Loaded Vinyl' which is a recognised noise and vibration mitigation material in addition to the commercial ceiling being double boarded (including relevant fire-resistant boarding) which exceeds building regulation requirement.
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10. Residential Amenity

The proposed apartments have been designed within the existing space available. Outdoor space is limited; however, it is adequate to provide a compliant bin/recycling store and bike storage.

Newport City Council Supplementary Planning Guidance for Flat Conversions (February 2019) states (5.5.1) that outdoor amenity space, whether a back garden or patio, should be made available to the occupants of a converted flat wherever the opportunity exists. In this instance, there is limited outdoor space which is provided and affords some amenity space. However, the opportunity does not exist for extensive outdoor space. The proposed development remains compliant with policy on this basis.

Alternative amenity space is in abundance in the region with the local Belle Vue park just moments away with the Friars Road entrance being just 0.3 miles away. Clifton Park, accessed from Stow Hill close to the Cathedral is also 0.3 miles away, providing an alternative. And Charles Street is only 0.6 miles away which would provide convenient and easy access to the Friars Walk shopping centre and large outdoor space with coffee shops and other amenities that is a real asset to the community and flagship development in the city centre.

There will be no material loss of amenity to neighbouring residents as a result of the proposal.

11. Conclusion

- 11.1. As detailed in this Planning Statement, the site is located in a well-established and sustainable area, supporting both residential and commercial uses. The proposed development will provide much-needed housing, addressing local community needs, while retaining the ground-floor retail unit to continue offering employment opportunities within the community. Reinstating a building that has been empty and derelict for more than 7 years.
- 11.2. The property benefits from two off-street parking spaces, and its close proximity to the City Centre, along with excellent transport links—including a bus stop directly outside and easy access to Newport train station—fully justifies the absence of additional parking spaces. Furthermore, the property is currently a three bedroom residence and as proposed will remain overall three bedrooms, therefore no difference to demand. In addition to this, the parking survey has assessed nearby roads, confirming that sufficient on street parking is available, if needed. Within the courtyard, there will also be bike storage, encouraging sustainable transport options with an electrical charging point. The development is within walking distance of a range of amenities, including shops, restaurants, and services, further reducing reliance on private car use.
- 11.3. The tenants are expected to be working professionals. The design of the development has been carefully considered to ensure compliance with national and local planning policies, including Policy H8. The proposal includes provisions for noise insulation, fire safety, and amenity standards, in line with the required regulations.

Additionally, the Environmental Health Officer and Police Officer both raised no objections during the pre-planning application feedback for conversion to HMO, whereas now proposed as two self-contained apartments, the demand on such matters would be further reduced.



11.4. In light of the scheme's compliance with the development plan and the positive feedback received, it is respectfully requested that planning permission be granted, allowing the development to contribute positively to the local community and meet housing needs.

Prepared by: [Planning Consultant or Applicant Name]

Date: [Insert Date Here]