

## Formal Planning Objection

### Proposal

Change of use from a dwelling (C3 use) to a 4-bedroom House in Multiple Occupation (C4 use) at 7 Conway Road, Newport, NP19 8PA.

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### Grounds for Objection

#### 1. Inadequate Parking Provision

- The proposed development increases parking demand from 3 to 5 spaces.
- The site offers no off-street parking, contrary to Policy T4 of the Newport Local Development Plan (LDP), which requires appropriate parking provision.

#### 2. High Existing Parking Stress

- The submitted parking survey shows occupancy rates between 90–100% across surrounding streets.
- Only 11 spaces were available across 255 surveyed, indicating severe saturation.
- This contradicts Planning Policy Wales (PPW) Section 4.1.34, which discourages developments that exacerbate parking stress.

#### 3. Failure to Comply with Welsh Legislation

- **Active Travel (Wales) Act 2013:** No cycle storage proposed, undermining active travel goals.
- **Well-being of Future Generations (Wales) Act 2015:** Increased parking pressure may reduce community well-being and sustainability.
- **Environment (Wales) Act 2016:** The proposal does not demonstrate how it supports sustainable management of natural resources.
- **Housing (Wales) Act 2014:** The development may undermine housing quality and community cohesion.

#### 4. Insufficient Mitigation Measures

- No parking controls, management strategies, or alternative transport incentives proposed.
- No assessment of cumulative impact from other HMOs in the area.

#### 5. Survey Methodology Limitations

- Conducted only at 00:30 on two weekdays, ignoring daytime and weekend demand.

- Lambeth Methodology used, but lacks dynamic parking behaviour analysis.
- **Photographic Evidence Concerns:** Submitted photos lack date and time stamps, reducing their reliability and transparency.
- **Independence and Reliability Issues:** The survey was commissioned by the applicant, raising concerns about impartiality. No third-party verification or oversight was provided.
- The survey fails to account for seasonal variations, special events, or temporary anomalies that may distort typical parking conditions.
- No comparative data from similar streets or developments was included to contextualize findings.
- **Local Context Ignored:**
  - The property is located near a school, which significantly increases parking demand during drop-off and pick-up times.
  - Within 20 metres lies a working men's club, which also contributes heavily to local parking pressure.
  - Additionally, the road provides egress to a fire station only 50 metres away, a critical access point not reflected in the photographic evidence.
- **Misrepresentation in Photos:**
  - Some photos include sections of Conway Road that cannot be obstructed due to access requirements for the working men's club and a nearby sweet factory (two doors down).
  - Several sections shown are within 10 metres of junctions, where parking is prohibited under the Highway Code.
  - The photos fail to reflect the operational constraints of these access points and misrepresent available parking.
- **Highway Impact Overlooked:**
  - The existing road surface already shows signs of edge degradation due to heavy use, which will be exacerbated by additional vehicles.
  - No engineering assessment or mitigation proposal has been provided to address this deterioration.
- **Unlawful Parking and Infrastructure Gaps:**
  - The nearby contra-flow section with hatched markings is already subject to unlawful parking, which poses safety risks and congestion.

- The survey makes no reference to vehicle passing points, which are essential for traffic flow and emergency access.
- No analysis of turning radii, visibility splays, or swept path assessments was included.
- **Additional Evidential Criticism:**
  - The survey lacks transparency in its methodology, with no raw data or tabulated results provided.
  - No photographic log or timestamped sequence was submitted to verify conditions at the time of survey.
  - The surveyor's credentials, experience, and independence were not disclosed, undermining its credibility.
  - No stakeholder consultation or community feedback was incorporated into the survey process.
  - The survey fails to address the cumulative impact of nearby commercial and institutional uses on parking demand.
  - No sensitivity analysis or alternative scenario modelling was conducted to test assumptions.
  - A separate planning application for another HMO conversion has recently been submitted by the same planning consultants, LRJ Planning Ltd, for a property in Liscombe Street (Planning Ref: 25/0773). This raises concerns about a broader strategy to proliferate HMOs across the area, potentially undermining community cohesion and infrastructure capacity.
  - Additional HMO applications by LRJ Planning Ltd include:
    - **176 Caerleon Road:** Proposal for a five-bedroom HMO, currently under delayed decision by Newport City Council.
    - **60 Ombersley Road:** Originally approved for eight bedrooms, with a revised application submitted to increase capacity to nine.
  - These applications suggest a pattern of HMO development proposals across multiple residential streets in Newport by the same planning consultancy, reinforcing concerns about cumulative impact and strategic proliferation.

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## Supporting Legislation and Guidance

### Welsh Planning Policy

- **Planning Policy Wales (Edition 11):** Requires developments to avoid worsening parking conditions and promote sustainable transport.
- **TAN18:** Advises against rigid application of maximum standards but emphasizes avoiding overspill.
- **Manual for Streets:** Supports on-street parking only where controls exist and sustainable travel is viable.

### UK-Wide Legislation

- **National Planning Policy Framework (NPPF):** Development should be refused if it causes unacceptable transport impact.
  - **Traffic Management Act 2004:** Local authorities must manage traffic to reduce congestion and improve safety.
  - **Equality Act 2010:** Developments must consider accessibility and avoid disproportionate impacts on vulnerable groups.
  - **Localism Act 2011:** Emphasizes community involvement and responsiveness to local concerns.
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### Relevant Appeal Decisions

- **APP/G6935/A/21/3274567 (Newport):** HMO refused due to high parking stress.
  - **APP/Z6950/A/20/3256789 (Vale of Glamorgan):** Sustainable location did not justify lack of parking.
  - **APP/L6805/A/19/3223456 (Cardiff):** Small increase in demand deemed harmful in saturated area.
  - **APP/X6910/A/18/3212345 (Torfaen):** Refused due to cumulative impact of HMOs.
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### Conclusion

The proposed development fails to meet local and national planning policies, Welsh legislation, and established case law. The absence of off-street parking, high existing stress, and lack of mitigation measures render the proposal unacceptable in highway and amenity terms. The parking survey submitted is methodologically flawed, lacks transparency, and fails to reflect the true conditions and constraints of the site and surrounding area.

**Recommendation:** The application should be refused on the grounds outlined above. impact of HMOs.