

**From:**

**Sent:** 17 October 2025 16:31

**To:**

**Subject:** Comprehensive Critique of Green Infrastructure Statement Planning Application 25/0841 – Proposed Conversion of 7 Conway Road, Newport to a House in Multiple Occupation (HMO)

## **Comprehensive Critique of Green Infrastructure Statement**

### **Planning Application 25/0841 – Proposed Conversion of 7 Conway Road, Newport to a House in Multiple Occupation (HMO)**

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#### **1. Failure to Comply with Planning Policy Wales (Edition 12, February 2024)**

The submitted Green Infrastructure Statement (GIS) fails to meet the statutory requirements outlined in Chapter 6 of Planning Policy Wales (PPW), Edition 12. PPW mandates a step-wise approach to biodiversity enhancement and green infrastructure integration. The document submitted is superficial, tokenistic, and devoid of any meaningful ecological assessment.

- **No DECCA Application:** While DECCA is referenced, there is no application of its principles—no habitat mapping, species impact analysis, or climate resilience planning.
  - **No Ecological Survey:** The absence of a Preliminary Ecological Appraisal (PEA), Phase 1 Habitat Survey, or Biodiversity Metric Assessment contravenes Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009).
  - **No Long-Term Management Plan:** Step 5 of the PPW step-wise approach requires a long-term management strategy. None is provided.
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#### **2. Tokenistic Biodiversity Enhancement**

The proposal offers a single bird nesting box as its sole biodiversity enhancement. This is grossly inadequate and fails to meet the requirements of:

- **PPW 6.4.5:** Requires developments to deliver a net benefit for biodiversity.
- **Environment (Wales) Act 2016, Section 6:** Places a duty on public authorities to maintain and enhance biodiversity and promote ecosystem resilience.

There is no species justification, no integration with existing habitat, and no consideration of multi-taxa enhancements (e.g. bats, hedgehogs, pollinators). This is particularly concerning given the urban context and proximity to green corridors.

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### 3. Failure to Address Sensitive Local Context

The GIS fails to consider the sensitive receptors and infrastructure surrounding 7 Conway Road:

- **Eveswell Primary School (approx. 150m):** Increased occupancy and reduced green infrastructure may exacerbate air quality and noise impacts on pupils. The absence of vegetative screening or acoustic mitigation is a missed opportunity to buffer these effects.
- **Conway Working Men's Club (adjacent):** The club's outdoor amenity space may be affected by increased waste, noise, and light pollution, with no mitigation proposed.
- **Railway Line (approx. 200m):** The proximity to the railway line raises concerns about noise pollution and ecological fragmentation. No assessment is provided on how the development may affect or be affected by rail infrastructure, nor any consideration of green buffers or acoustic mitigation.

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### 4. Contravention of Local Development Plan Policies

The proposal conflicts with the Newport Local Development Plan (LDP) 2011–2026:

- **Policy GP5 (Natural Environment):** Requires development to protect and enhance biodiversity. The GIS fails to demonstrate any enhancement beyond a single bird box.
- **Policy SP13 (Planning Obligations):** The absence of meaningful green infrastructure undermines the principle of securing community and environmental benefits.
- **Policy CE9 (Green Infrastructure):** The proposal does not contribute to Newport's Green Infrastructure Network, nor does it align with the Green Infrastructure Supplementary Planning Guidance (SPG).

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### 5. Omission of Relevant Surveys and Data

There is no reference to:

- **Newport Biodiversity Action Plan (BAP):** The site falls within an urban area identified for pollinator corridors and bat connectivity.
- **Newport Green Infrastructure Assessment (2020):** Highlights the need for urban greening and canopy expansion in Maindee and St Julian's wards.

- **Air Quality Management Area (AQMA):** Conway Road is within proximity to AQMA zones. The GIS fails to address how green infrastructure could mitigate air pollution.
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## 6. Failure to Address Cumulative Impact of HMO Conversions

The GIS does not consider the cumulative ecological degradation resulting from multiple HMO conversions in the area. Case law such as *R (Loader) v Rother District Council [2016] EWHC 2014 (Admin)* confirms that cumulative impacts must be assessed where multiple developments may lead to significant environmental effects.

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## 7. Procedural Deficiencies and Lack of Evidentiary Weight

The document lacks:

- **Authorship and Credentials:** No indication of who prepared the GIS, their qualifications, or ecological expertise.
  - **Date and Version Control:** Undermines its validity as a formal planning document.
  - **References and Citations:** No supporting studies, data sources, or legislative references are provided.
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## 8. Lack of Spatial Analysis and Mapping

- **No Site Plan Integration:** The GIS fails to overlay green infrastructure proposals onto a site plan. There is no spatial representation of where the bird box will be located, nor any mapping of existing ecological features.
  - **No Buffer Zone Analysis:** The absence of buffer zone mapping or impact radii is a critical omission.
  - **No Connectivity Assessment:** There is no analysis of ecological connectivity to nearby green corridors.
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## 9. Absence of Climate Adaptation Measures

- **No Urban Cooling Strategy:** PPW Chapter 6 encourages developments to contribute to climate resilience. The GIS does not address urban heat island mitigation, permeable surfaces, or shading.

- **No Flood Risk Mitigation:** Despite the urban context and proximity to hard infrastructure (railway line), there is no mention of SuDS (Sustainable Drainage Systems), attenuation features, or runoff management.
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## 10. No Reference to Ecosystem Services

- **PPW 6.4.9** requires consideration of ecosystem services. The GIS does not address:
    - Air purification
    - Noise attenuation
    - Pollination support
    - Mental health and wellbeing benefits of green space
  - **No Quantification:** There is no attempt to quantify ecological value or ecosystem service contribution using tools such as Natural Capital Accounting or Biodiversity Net Gain metrics.
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## 11. Failure to Address Policy Integration Across Scales

- **No Reference to Future Wales: The National Plan 2040:** This national policy document prioritises placemaking and green infrastructure. The GIS fails to demonstrate alignment with its spatial principles.
  - **No Integration with Well-being of Future Generations (Wales) Act 2015:** The GIS does not address the Act's goals, particularly "A Resilient Wales" and "A Healthier Wales."
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## 12. Inadequate Public Realm Consideration

- **No Community Benefit:** The GIS does not propose any enhancements to the public realm, such as street greening, verge planting, or community garden integration.
  - **No Stakeholder Engagement:** There is no evidence of consultation with local stakeholders, including Eveswell Primary School or the Working Men's Club.
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## 13. No Monitoring or Enforcement Mechanism

- **No Post-Implementation Strategy:** There is no commitment to monitoring biodiversity outcomes, nor any enforcement mechanism to ensure the bird box is installed, maintained, or replaced.

- **No Planning Condition Proposal:** The GIS does not suggest any planning conditions to secure biodiversity enhancements.
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#### 14. Misuse of Visual Content

- **Figure 1 Misrepresentation:** The diagram included is poorly formatted, lacks clarity, and appears to be a generic reproduction of PPW guidance without contextual application.
  - **Irrelevant Retail Imagery:** The inclusion of a screenshot from a commercial bird box listing is inappropriate in a statutory planning document. It undermines the professionalism and evidentiary weight of the submission.
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#### 15. No Reference to Local Biodiversity Records or Species Data

- **No Consultation with SEWBRcC:** The South East Wales Biodiversity Records Centre holds species data for the area. The GIS does not reference any local records or protected species alerts.
  - **No Bat Roost or Nesting Survey:** Given the age and typology of the property, and its proximity to mature trees and rail infrastructure, a bat roost assessment should have been considered.
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#### 16. Conclusion and Grounds for Refusal

In light of the above, the submitted Green Infrastructure Statement is procedurally deficient, substantively inadequate, and fails to meet the statutory and policy requirements of:

- Planning Policy Wales (Edition 12, Chapter 6)
- Environment (Wales) Act 2016
- Technical Advice Note 5
- Newport Local Development Plan Policies GP5, SP13, CE9
- Future Wales: The National Plan 2040
- Well-being of Future Generations (Wales) Act 2015
- Case law on cumulative environmental impact

This failure to provide a robust, evidence-based GIS constitutes a material planning consideration and forms a standalone ground for refusal of Planning Application 25/0841.