

From:

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To:

Subject: Comprehensive critique of: Plan

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

This document presents a comprehensive, evidence-based objection to Planning Application 25/0841 for the proposed conversion of 7 Conway Road, Newport to a House in Multiple Occupation (HMO). It critically analyses the submitted planning document "ViewDocument [4.pdf](#)" and identifies extensive procedural, technical, contextual, and policy-based deficiencies.

1. Deficiencies in Site Contextualisation and Environmental Integration

- **Proximity to Sensitive Community Infrastructure:**
 - **Eveswell Primary School** lies within close proximity. The proposed intensification of residential use via HMO conversion raises safeguarding concerns, particularly regarding increased transient occupancy, potential antisocial behaviour, and traffic congestion during school hours. Planning Policy Wales (Edition 11, para 4.2.2) emphasises the need to protect community facilities and ensure developments do not compromise the safety or wellbeing of vulnerable groups.
 - **Newport Fire Station** requires unobstructed access routes. The proposed bin and bicycle storage layout, combined with intensified parking demand, risks obstructing emergency access, contravening TAN 12: Design (2016).
 - **Conway Working Men's Club**, a longstanding community venue, is not referenced. The cumulative impact of HMOs on community cohesion and noise disruption is well-documented in studies such as "HMOs and Community Fragmentation" (WLGA, 2021).
- **Environmental Oversight:**
 - The adjacent **railway line**, functioning as a nature corridor, supports biodiversity and urban greening. Under the Environment (Wales) Act 2016, Section 6, public authorities must maintain and enhance biodiversity. No ecological scoping or Phase 1 Habitat Survey is provided.

2. Technical and Procedural Failures in the Submitted Drawings

- **Non-Standard and Ambiguous Scaling:**
 - The location plan scale is ambiguously marked as “1:12,50” – a non-standard ratio. This undermines spatial verification, violating the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, Article 7(1)(c).
 - Symbols such as “₹”, “£”, “#”, “+” appear without legend or explanation, breaching Regulation 9 of the Planning Applications Regulations (Wales) 2016.
- **Missing Dimensions and Inadequate Annotation:**
 - The proposed first floor plan lacks room dimensions, ceiling heights, and window specifications. This prevents assessment against Newport City Council HMO Licensing Standards.
 - The disclaimer “All dimensions to be checked on site prior to construction” is inappropriate for planning submissions.
- **Elevational and Contextual Deficiencies:**
 - The “FRONT VIEW”, “SIDE VIEW”, and “REAR VIEW” lack contextual massing, neighbouring building heights, or fenestration alignment, contravening TAN 12: Design.

3. Policy Non-Compliance and Strategic Planning Conflicts

- **Newport Local Development Plan (LDP) 2011–2026:**
 - **Policy H2 (Conversion to HMO)** is breached due to over-concentration. Conway Road already hosts multiple HMOs, exceeding the 10% threshold outlined in Newport’s HMO SPG.
 - **Policy GP2 (General Amenity)** is violated due to lack of private amenity space, inadequate refuse storage, and poor internal layout.
- **Planning Policy Wales (Edition 11, February 2021):**
 - Emphasises placemaking and sustainable communities. The proposal undermines these principles.
 - **TAN 20: Planning and Welsh Language** is relevant given proximity to Welsh-medium education providers. No linguistic impact assessment is provided.
- **Licensing and Safety Oversight:**

- No evidence of compliance with the **Housing Act 2004** or the Management of Houses in Multiple Occupation (Wales) Regulations 2006.
- No fire safety strategy is provided, despite proximity to Newport Fire Station and obligations under the Regulatory Reform (Fire Safety) Order 2005.

4. Omission of Supporting Surveys and Impact Assessments

- **Transport and Parking Stress:**
 - Conway Road suffers from high parking stress. No Transport Statement is provided, violating Policy T4
- **Noise and Amenity Impact:**
 - No BS8233-compliant Noise Impact Assessment is provided.
- **Waste and Refuse Management:**
 - Bin and bicycle storage is inadequately detailed, risking visual intrusion and odour nuisance, contravening Policy GP4.

5. Fire Safety Risks Associated with Building Typology and Age

- **Terraced Housing Vulnerabilities:**
 - The property is part of an older terraced row with shared roof voids and limited compartmentalisation. These features present elevated fire transmission risks. No fire risk assessment is submitted.
- **Attic Configuration and Escape Routes:**
 - No detail is provided regarding attic access, insulation, or fire separation. If attic rooms are proposed or exist, they must comply with Approved Document B of the Building Regulations 2010.
- **Case Law and Precedent:**
 - *R (Peat) v Hyndburn Borough Council [2011] EWHC 1739 (Admin)* confirms fire safety as a material planning consideration.
 - The Fire Safety Act 2021 reinforces the duty to assess external walls and common parts in multi-occupancy buildings.

6. Architectural and Design Deficiencies

- **Lack of Contextual Elevation Studies:**
 - No street scene elevation or contextual massing studies are provided.
- **No Materials Schedule or External Finishes:**
 - No specification of proposed materials or finishes is included.
- **Absence of Daylight and Overshadowing Analysis:**
 - No BRE-compliant daylight/sunlight study is provided.

7. Internal Layout and Occupancy Concerns

- **Over-Intensification and Poor Spatial Planning:**
 - Multiple bedrooms with minimal shared amenity space violate HMO Licensing Standards.
- **No Evidence of Soundproofing or Acoustic Separation:**
 - No detail on insulation or acoustic treatment is provided.
- **Inadequate Sanitary Provision:**
 - Bathroom and WC provision is unclear and likely non-compliant.

8. Procedural and Legal Omissions

- **No Statement of Community Consultation:**
 - No evidence of engagement with residents, schools, or community groups is provided.
- **No Planning Statement or Design and Access Statement (DAS):**
 - The absence of a DAS violates Article 7 of the Development Management Procedure Order.
- **No Flood Risk or Drainage Strategy:**
 - No SuDS strategy or flood risk screening is provided, violating TAN 15.

9. Data Integrity and Copyright Concerns

- **Unclear Authorship and Document Provenance:**
 - The drawing references "TOWER RESIDENTIAL DESIGN" and "LRJ PLANNING" but lacks formal declaration of authorship or accreditation.

- **Copyright Disclaimer Conflicts:**
 - The restrictive copyright clause contradicts public scrutiny obligations under the Aarhus Convention.

10. Cumulative Impact and Precedent Risk

- **No Cumulative Impact Assessment:**
 - The absence of such an assessment prevents evaluation of social fragmentation and amenity degradation.
- **Precedent Setting Without Safeguards:**
 - Approval risks setting a precedent for future conversions without adequate scrutiny.

11. 1. Missing Site Constraints and Risk Mapping

- No identification of site constraints such as utilities, easements, or underground services.
- No reference to flood zones, contaminated land, or radon risk areas despite Newport's known susceptibility.

2. Absence of Construction Methodology or Phasing

- No indication of construction phasing, access strategy, or site compound layout.
- No compliance with Construction (Design and Management) Regulations 2015 (CDM 2015).

3. No Tree Survey or Landscaping Strategy

- No arboricultural survey or tree constraints plan provided.
- Landscaping marked as "indicative only" with no planting schedule, boundary treatment, or permeable surfacing detail.

4. No Energy or Sustainability Statement

- No mention of energy efficiency, insulation upgrades, or low-carbon measures.
- No SAP calculations, EPC projections, or reference to Building Regulations Part L.

5. No Refuse Collection Strategy or Waste Audit

- Bin storage area vaguely annotated without capacity or enclosure detail.
- No waste audit statement provided, violating the Waste (Wales) Measure 2010.

6. No Fire Strategy or Means of Escape Plan

- No smoke detection layout, protected stairwell design, emergency lighting, or fire door specifications.
- Violates Approved Document B and Housing Health and Safety Rating System (HHSRS).

7. No Accessibility or Inclusive Design Measures

- No compliance with Part M of the Building Regulations.
- No level access, handrail provision, or door width compliance.

8. No Noise Mitigation or Railway Buffering

- No acoustic buffering, glazing specification, or vibration mitigation strategy.
- Violates BS8233 and undermines residential amenity under Policy GP2.

Case Law and Precedent Summary

- **R (Khodari) v Royal Borough of Kensington and Chelsea [2017] EWHC 408 (Admin)** – cumulative impact and character must be considered.
- **R (Westminster City Council) v Secretary of State [2013] EWHC 690 (Admin)** – robust evidence is essential.
- **R (Peat) v Hyndburn Borough Council [2011] EWHC 1739 (Admin)** – fire safety is a material planning consideration.

Conclusion

The submitted planning document is wholly inadequate. It fails to meet the technical, procedural, and policy standards required for planning approval. It omits critical assessments, disregards community sensitivities, and undermines strategic planning objectives. Approval of this application would compromise public safety, community cohesion, and environmental stewardship in Newport.

This objection is submitted with full evidentiary weight and demands refusal of Planning Application 25/0841. Should the application proceed, further procedural challenges and FOI-based scrutiny will be pursued.