

From:

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To:

Subject: Comprehensive Critique of the Submitted Planning Statement for Application 25/0841

Comprehensive Critique of the Submitted Planning Statement for Application 25/0841

This document provides a rigorous, evidence-based critique of the Planning Statement submitted by LRJ Planning Ltd in support of the proposed conversion of 7 Conway Road, Newport (NP19 8PA) to a House in Multiple Occupation (HMO). The critique exposes procedural, evidential, and policy-based deficiencies, demonstrating non-compliance with national and local planning frameworks, including relevant legislation, technical guidance, and case law.

1.0 Inadequate Policy Interpretation and Misapplication

1.1 Misrepresentation of Policy H8 (Newport LDP)

The Planning Statement asserts compliance with Policy H8 of the Newport Local Development Plan (LDP), citing the 10% threshold for HMOs within a 50m radius. However, it fails to provide any verifiable data or methodology for calculating this threshold. The absence of a mapped radius, address-level breakdown, or temporal context renders the claim unverifiable and procedurally deficient.

Moreover, Policy H8 requires assessment of cumulative impact on neighbourhood character and housing balance. The Statement offers no demographic analysis, tenure breakdown, or socio-economic profiling to demonstrate that the proposal would not contribute to an imbalance in the housing stock. This omission is contrary to Planning Policy Wales (PPW) Edition 11, paragraph 4.2.2.

1.2 Misuse of SPG (2016) on HMOs

The Planning Statement references the Council's Supplementary Planning Guidance (SPG) on HMOs but fails to engage with its full scope. The SPG requires consideration of:

- Bedroom sizes and internal layout standards
- Noise insulation measures
- Bin and cycle storage
- Impact on local services and infrastructure

None of these are substantively addressed. The absence of acoustic insulation specifications, refuse management plans, or cycle storage details contravenes the SPG's general principles (Section 5.0).

2.0 Procedural and Evidential Deficiencies

2.1 Deficient Parking Survey and Misleading Conclusions

The Planning Statement asserts that a Parking Survey was submitted and that it substantiates adequate on-street parking capacity. While a survey window is referenced, the submission is critically deficient in both methodology and evidential rigour:

- No survey methodology is disclosed
- No spatial mapping or photographic evidence is provided
- No temporal justification is offered for the chosen survey window
- No reference to Newport's own HMO parking studies is made

This is particularly concerning given the site's proximity to:

- Eveswell Primary School (approx. 150m)
- Newport Working Men's Club (approx. 100m)
- Newport Fire Station (approx. 300m)

The Planning Statement's failure to engage with this local evidence base is a material omission.

3.0 Omission of Residential Amenity Impact Assessment

Despite referencing Policy GP2 and H8, the Planning Statement fails to provide any quantified or qualitative assessment of residential amenity impacts:

- No occupancy profile is provided
- No assessment of internal noise transmission
- Bin storage is proposed but deficient:
 - No specification of bin type or capacity
 - No compliance with Newport's Waste Storage and Collection SPG (2015)
 - No containment or access measures
- No cycle storage details are provided

4.0 Failure to Address Ecological and Environmental Context

The site lies within 50 metres of the railway corridor, which functions as a nature corridor supporting urban biodiversity. The Planning Statement fails to:

- Reference Section 6 of the Environment (Wales) Act 2016
- Provide any Preliminary Ecological Appraisal (PEA) or bat roost assessment
- Consider cumulative ecological impact

This omission is contrary to PPW Edition 11, paragraph 6.4.5.

5.0 No Community Impact Assessment

The Statement fails to engage with the broader social implications of HMO intensification:

- No reference to Newport's Community Cohesion Strategy or local crime statistics
- No consultation with local stakeholders
- No assessment of emergency service access

This contravenes PPW para 3.16.

6.0 Mischaracterisation of “No External Alterations”

While the Statement claims no external changes, this is misleading:

- HMO conversion typically requires additional fire escape signage, external lighting, and meter boxes
- No elevation drawings or external services layout are provided

This undermines the claim that the proposal preserves the character of the area and contravenes GP2's requirement for design sensitivity.

7.0 Absence of Management Plan

There is no submitted HMO Management Plan, which is essential for:

- Clarifying tenant vetting procedures
- Setting out anti-social behaviour protocols
- Detailing refuse and maintenance responsibilities

This omission is contrary to best practice guidance from the Chartered Institute of Housing.

Conclusion

The Planning Statement submitted in support of Application 25/0841 is procedurally deficient, substantively incomplete, and strategically misleading. It fails to demonstrate compliance with the Newport Local Development Plan, Planning Policy Wales, and associated technical guidance. The absence of robust evidence, stakeholder engagement, and contextual sensitivity renders the proposal incompatible with the principles of sustainable development, residential amenity, and community cohesion.

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 demonstrable non-compliance and the weight of objectionable evidence, it is respectfully submitted that planning permission should be refused in full.