

Section 73 Planning Statement

Property: 175A Commercial Street (Unit 3, Westgate Building),
Newport NP20 1JN

Planning Reference: 22/0794

Application Type: Section 73 TCPA 1990– Variation of Condition 01, 03, & 04 (Approved Plans) And Discharge of Conditions 05,06 & 07

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1. Introduction

This planning statement is submitted in support of an application under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary Condition 01 (Approved Plans) of planning permission 22/0794, which granted consent for the conversion of the first floor of 175A Commercial Street, Newport into a 6-bedroom House in Multiple Occupation (HMO).

The proposed amendments remain entirely within the scope of the approved C4 (HMO) use class, retain the same number of bedrooms (6), and do not alter the external footprint or character of the building.

This statement also provides detailed responses to conditions previously imposed (Conditions 5–7) and justification for discharging Conditions 3, 4, 5, 6 & 7 from the original decision.

The development continues to provide high-quality shared accommodation, fully in line with Newport's housing policy objectives.



Fig. 1 - Aerial View from Google Earth



Fig. 2 - Main entrance to the building marked in red.

2. Description of Proposed Amendments

The revised internal layout seeks to improve functionality, compliance, and structural safety. Key changes are as follows:

- **Window and Load-bearing wall retention:** A window to the rear of the building previously marked for replacement is now proposed to be retained in situ. This decision is based on both its sound condition and the structural decision not to remove the adjacent load-bearing wall previously approved for removal, as following structural review, removal would result in less than 2m headroom which leads to the rear fire exit. This would breach Building Regulations (Approved Document B, escape route headroom) and compromise safety. Retaining the wall avoids these risks while still delivering the approved HMO use.
- **Kitchen relocated** within the floor plan to a central location to provide better circulation, proximity to better mechanical amenities and ventilation routes, and fire separation.
- **Stud wall inserted** to divide a large bedroom into more practical spaces for improved usability.
- **Reduction in en-suites:** three bedrooms retained with en-suites, three bedrooms sharing well-located off-suite bathrooms. This change is due to structural and service constraints as it isn't mechanically possible to run drainage pipework to certain locations without significant structural intervention.
- **Waste Storage & Recycling enhancement.**
- **Provision of Additional Communal Amenity Space**

As part of this Section 73 application, the internal layout has been amended to provide multi-functional study room, reflecting both design refinement and user flexibility. This revised space is envisioned as a quiet work and leisure area, ideal for Newport's city centre HMO market. Benefits include:

1. Enhanced Amenity – A study provides concentrated space for work or relaxation, better aligning with amenity standards under LDP Policy GP2.
2. Policy Alignment & Licensing – Still above the minimum communal space requirement in HMO licensing, it provides a functional alternative that responds to modern tenant needs.
3. Market Differentiation – Offers added value through dedicated workspace, making the property more appealing to professionals or postgraduate tenants, supporting retention and lower turnover.
4. Social & Practical Value – Fulfils evolving tenant expectations for WFH or private leisure areas in compact HMOs.
5. No Additional Planning Impact – The study maintains the same floor area, occupancy, and external envelope as originally approved.
6. Forward-Looking Design – It reflects thoughtful HMO design that exceeds standard provision while respecting policy and user demand.



Fig 3 - Showing retained rear window marketed with orange points



Fig 4- Showing load bearing wall with stairs springers marketed with orange points

3. Planning Justification

(a) Justifications

- The number of bedrooms (6) and overall occupancy are unchanged.
- The external appearance remains unaffected; no new external works are proposed.
- The amendments address structural feasibility and service routing constraints, providing a safer, more buildable scheme that prevents it from falling into a state of disrepair and causing damage to a building that is of architectural and historic value.

(b) Policy Compliance

The proposed amendments represent minor material changes that do not alter the nature, intensity, or external appearance of the approved development. The scheme remains fully compliant with:

- Policy H6 – ensures adequate space and amenity standards for HMO accommodation.
- Policy GP2 (Amenity) – ensures living conditions are safeguarded.
- Policy GP7 (Environmental Protection and Public Health) – ensures noise, light, and ventilation are suitably addressed.
- Policy SP9 (Conservation of the Historic Environment) – by retaining the rear window and not altering the external façade, the proposal avoids harm to the character of the building.

- HMO licensing standards and Building Regulations.

4. Conditions discharge

Justification for Discharging Original Conditions 3 & 4

- Condition 3 (Windows – rear elevation): The original scheme proposed modifying a kitchen window to suit a new bedroom. As the kitchen is being retained in its original location, no window replacement is necessary. The existing timber casement window will remain unaltered, preserving the building's character.
- Condition 4 (Soldier Course – brick detailing): Similarly, this related to new window openings above two rear windows. As no new openings are now proposed, the soldier course detail is not required.

Therefore, these conditions are therefore requested to be discharged as the works that triggered them are no longer relevant.

5. Compliance with Remaining Conditions and discharge

The following conditions from the original decision notice remain relevant. This application confirms the proposed approach to ensure full compliance to fulfil conditions 5, 6 & 7 and get an approval:

(a) Condition 5 – Mechanical Extraction Ventilation

Requirement:

Prior to the commencement of development, details of the grilles/grates for the mechanical extraction ventilation shall be submitted to and approved in writing by the Local Planning Authority.

Proposed Specification

System:

- Bathrooms and Kitchen: Served by a centralised Mechanical Extract Ventilation (MEV) system with ductwork routed internally, ensuring no disruption to heritage fabric.
- Bedrooms and Living Areas: Background ventilation provided via integrated acoustic trickle vents within the new secondary glazing frames (see Condition 7). No external façade penetrations are required for habitable-room ventilation.

External Grilles (MEV Terminations):

- Heritage-style, powder-coated aluminium circular grilles (e.g., Nuaire Heritage Vent Grilles or Rytons A1 Fire-Rated Louvre Grilles), 100–300 mm Ø or 9 x 6 inches.
- Finish: RAL 9005 matt black or brick-colour powder coat to match existing fenestration.
- Location: Flush-mounted within mortar joints on the rear elevation only (not street-facing).
- Installation: Slimline bezel, anti-draught baffle, and insect mesh included.

Noise Mitigation:

- Inline duct silencers (600–1200 mm length) installed on the atmospheric side of the MEV, per the PJA Noise Impact Assessment (2022).
- Specified Product: Titon SF Xtra Sound Attenuator.

Tested performance:

- Up to 44 dB Dn,e,w (C;Ctr) when open
- Up to 55 dB Dn,e,w (C;Ctr) when closed
- This ensures both background and extract ventilation meet the strict acoustic targets while remaining visually unobtrusive.

Acoustic Performance & Compliance

- Bedrooms & Living Areas (via acoustic trickle vents): Maintain ≤ 35 dB LAeq,16h (day) and ≤ 30 dB LAeq,8h (night) with windows closed.
- Bathrooms & Kitchen (via MEV + silencers): Noise breakout limited to ≤ 30 –33 dB internally.
- System fully aligns with Condition 2, WHO guidelines, and Newport LDP Policies GP2 (amenity) and GP7 (design quality).

Heritage Compliance

- Rear elevation only, ensuring no impact on the street-facing façade.
- Grilles finished in heritage-sensitive matt black to blend with brickwork and preserve visual integrity (Policy SP9, LDP 2015).
- All habitable-room ventilation provided internally (secondary glazing trickle vents), ensuring no further façade interventions.

Installation Method

1. Internal Ductwork: All MEV ducting routed internally, boxed in with fire-rated/acoustic lining.
2. Grille Fixing: Circular core-drill penetration in rear wall mortar joint; grille flush-mounted with sealant.
3. Silencer Placement: Inline duct silencers installed within property, prior to grille connection.
4. Secondary Glazing Trickle Vents: Acoustic trickle vents integrated at the head of secondary glazing frames (Granada/Selectaglaze heritage series), ensuring background ventilation without external intervention.

This aligns directly with Condition 2, satisfies Condition 5 (grille/grate details), and avoids external façade works for bedrooms.

(b) Condition 6 – Rainwater Goods & Soil Pipes

Requirement:

Prior to the commencement of development, details of the rainwater goods and soil pipe shall be submitted to and approved in writing by the Local Planning Authority.

Proposed Specification

Soil & Foul Drainage

- **System & Routing:**
 - All new soil vent pipe (SVP) connections routed internally to the existing rear SVP.
 - No penetrations on the principal (street-facing) elevation.
- **Pipework:**
 - 110 – 150mm uPVC soil pipe system (e.g., Marley or Osma).
 - Boxed in with studwork lined in fire-rated plasterboard and acoustic-rated insulation to meet Approved Document E (sound) and B (fire).
 - Internal air admittance valves (AAVs) provided to avoid external pipework/vents on the façade.
- **Suggested Product:**
 - Marley 110 mm Soil & Vent Pipe, Black or Hargreaves 110 mm Soil & Vent Pipe, Black or Bitumen paint.
 - BS EN 1329 compliant, smooth bore with joining sleeve.
 - Manufacturer: Marley Plumbing & Drainage, Hargreaves Plumbing & Drainage

Rainwater Goods

- **Retention & Replacement Policy:**
 - Existing rear gutters and downpipes retained in situ.
 - Any replacement to match heritage character using cast-iron-effect uPVC products.
- **Specification:**
 - Gutters: 112 mm half-round heritage-style uPVC (e.g., Marley Alutec Traditional Range).
 - Downpipes: 68 mm round profile heritage-effect uPVC with traditional shoe outlets.
 - Fixings: Stainless steel rise-and-fall brackets to match heritage detailing.
- **Location:**
 - Rear elevation only if needed.
 - No works or changes to the front (principal) façade to preserve conservation character.
- **Suggested Product:**
 - Marley Alutec Traditional or Hargreaves goods Range with Heritage-Style Gutter & Downpipe
 - Finish: Black, cast-iron effect, durable polyester powder-coated uPVC.
 - Manufacturer: Marley Alutec or Hargreaves Plumbing & Drainage

Installation Method

1. **Soil Pipework**
 - a. Install 110 mm Marley/Osma uPVC pipes internally.
 - b. Connections routed to existing rear SVP.

- c. Boxed in with 2 layers of 12.5 mm fire-rated plasterboard and acoustic insulation within studwork.
- d. Internal AAVs fitted at termination points to avoid external vents.

2. Rainwater Goods

- a. Retain existing gutters/downpipes where condition allows.
- b. If replacement required: fix 112 mm half-round gutters with rise-and-fall brackets into mortar joints.
- c. Connect 68 mm round downpipes to existing rear gullies with traditional shoe outlet detail.
- d. All fixings in stainless steel to prevent corrosion.

Heritage & Planning Compliance

- Rear Elevation Only if needed – ensures no impact on the building's principal elevation.
- Heritage-style products replicate traditional cast iron appearance while providing low-maintenance uPVC performance.
- Policy Compliance: Works align with Newport LDP Policies GP2 (amenity), GP6 (quality of design), and SP9 (heritage protection).

Product Specification Summary

Component	Product Name	Specification & Performance
Soil Pipework	Marley 110 mm Soil & Vent Pipe, Black or Hargreaves Plumbing & Drainage	BS EN 1329, smooth bore, robust, boxed in with fire-rated acoustic lining
Rainwater Goods	Marley Alutec Traditional Gutter & Downpipe or Hargreaves Plumbing & Drainage	112 mm half-round gutter, 68 mm round downpipe, uPVC heritage cast-iron effect, black finish

(c) Condition 7 – Sound Insulation for floors in rooms

Requirement:

Submit details of insulation type, location, and installation.

Proposed Specification:

To ensure residents are protected from both internal and external noise, the floor construction will achieve a minimum of 53 dB DnT,w + Ctr airborne insulation, in accordance with the PJA Noise Impact Assessment. This represents a 10 dB uplift above Approved Document E (Building Regulations minimum standard).

Two compliant build-ups are proposed, with the final choice dependent on market conditions and supply chain availability. Both ensure compliance with Condition 2, Condition 7, and Approved Document E.

Option 1 – PJA Recommended Build-Up (Floating Timber Batten System)

Base Construction:

- 200 mm hollowcore plank / reinforced concrete floor slab ($\geq 305 \text{ kg/m}^2$).

Floor Build-Up:

- 65 mm cementitious screed ($\geq 80 \text{ kg/m}^2$).
- $\geq 45 \text{ mm}$ resilient timber battens / cradle system.
- $\geq 25 \text{ mm}$ mineral wool infill (density $10\text{--}60 \text{ kg/m}^3$).
- 18 mm tongue & groove (T&G) chipboard or plywood floorboard.

Performance:

- $\geq 53 \text{ dB DnT,w} + \text{Ctr}$ airborne insulation.
- Enhanced impact sound resilience.
- Robust detail widely used in high-performance residential schemes.

Suggested Products:

- Acoustic Mineral Wool Slab – Rockwool Flexi (density 45 kg/m^3).
- T&G Floorboard – Caberfloor P5 18 mm.

Option 2 – Alternative Build-Up (Resilient Mat + Overlay System)**Base Construction:**

- 200 mm hollowcore plank / reinforced concrete slab ($\geq 305 \text{ kg/m}^2$).

Floor Build-Up:

- 65 mm cementitious screed ($\geq 80 \text{ kg/m}^2$).
- Resilient acoustic mat (6–10 mm), options include:

1. Regupol 4515 Multi (6 mm recycled rubber)

- Dynamic stiffness: $\leq 15 \text{ MN/m}^3$
- Impact reduction: up to 22 dB
- Fire class: Efl (EN 13501-1)
- Manufacturer: CMS Danskin UK

2. Isorubber Base (9 mm recycled rubber base)

- Dynamic stiffness: $\leq 20 \text{ MN/m}^3$
- Impact reduction: $\sim 20 \text{ dB}$
- Manufacturer: Thermal Economics UK

3. SoundLay Plus (10 mm high-mass mat)

- Density: $8\text{--}10 \text{ kg/m}^2$

- Rw uplift: +3–5 dB
- Manufacturer: Custom Audio Designs UK
- 18 mm moisture-resistant T&G chipboard overlay.
- 5 mm resilient edge strip at perimeters to prevent flanking transmission.
- Final finish: carpet, vinyl, or laminate as appropriate.

Performance:

- Airborne Insulation: 53–56 dB DnT,w + Ctr.
- Impact Reduction: ≥ 19 –22 dB LnT,w.
- Meets and exceeds PJA recommendations.

Installation Method

1. Option 1 (Floating Timber Batten System):

- a. Where no screed is present or sufficient on the existing hollowcore floor, install a 65 mm cementitious screed ($\geq 80 \text{ kg/m}^2$) to provide mass and levelling.
- b. Install resilient timber battens/cradle system.
- c. Infill voids with ≥ 25 mm mineral wool slabs.
- d. Fix 18 mm T&G chipboard flooring above battens.
- e. Apply resilient perimeter edge strips to isolate and prevent flanking sound transmission.

2. Option 2 (Resilient Mat + Overlay System):

- a. Where no screed is present or sufficient on the existing hollowcore floor, install a 65 mm cementitious screed ($\geq 80 \text{ kg/m}^2$) to provide mass and levelling.
- b. Install 6–10 mm resilient acoustic mat across the full floor area.
- c. Add 18 mm T&G moisture-resistant chipboard overlay.
- d. Apply 5 mm resilient edge strips around perimeters.
- e. Finish with floor covering (carpet/vinyl/laminate).

Location

- Applied to all separating floors between rooms within the development.
- No external façade alterations required; treatment is entirely internal.

Compliance

- Condition 7 – Provides ≥ 53 dB airborne insulation.

- Condition 2 – Ensures residents are not exposed to >35 dB LAeq (day) or >30 dB LAeq (night).
- Approved Document E – Achieves uplift of 10 dB above Part E baseline.
- Newport LDP GP2 & GP7 – Protects residential amenity and secures design quality.

Product Specification Summary

Component	Product Name / Example	Specification & Performance
Mineral Wool Infill	Rockwool Flexi Slab 45 kg/m ³	25 mm, fire and acoustic rated, infill between battens
Resilient Mat (Opt.)	Regupol 4515 Multi 6 mm	≤15 MN/m ³ stiffness, 22 dB impact reduction, recycled rubber
Resilient Mat (Opt.)	Isorubber Base 9 mm	≤20 MN/m ³ stiffness, ~20 dB impact reduction, recycled rubber
Resilient Mat (Opt.)	SoundLay Plus 10 mm	8–10 kg/m ² density, Rw uplift 3–5 dB, high-mass mat
Floor Overlay	Caberfloor P5 T&G Chipboard	18 mm, moisture-resistant, structural T&G flooring

• Walls (new partitions):

Requirement:

Prior to the commencement of development, details of the wall insulation and partition build-up shall be submitted to and approved in writing by the Local Planning Authority.

Proposed Specification

Acoustic Partition Build-Up

- Stud or timber Framework:
 - 100 mm acoustic studs (metal or Timber stud system with enhanced flanking control).
- Insulation:
 - 50 mm Rockwool RWA45 Acoustic Slab (density 45 kg/m³).
 - Mineral wool, non-combustible (Euroclass A1), designed to reduce airborne sound transmission.
- Plasterboard Lining:
 - Each side finished with 15 mm Gyproc SoundBloc boards (high-density gypsum board).
 - Taped, jointed, and skimmed finish.
- Performance Standard:
 - Weighted sound reduction ≥53 dB DnT,w + Ctr.
 - Fully compliant with Approved Document E (Resistance to the Passage of Sound).

Insulation Details

- **Type of Insulation:**
 - Rockwool RWA45 Acoustic Slab, 50 mm thickness.
 - Mineral wool insulation with excellent acoustic dampening and fire resistance.
 - Reduces both airborne and impact sound transmission through partitions.
- **Location:**
 - Positioned within the stud cavity of all new internal partitions separating habitable rooms (e.g., bedrooms, living areas, and circulation areas).
 - Not used on external heritage walls to avoid disruption of existing building fabric as this wasn't in the approved noise assessment recommendation.
- **Method of Installation:**
 1. Fix 100 mm metal or timber acoustic studs at 600 mm centres.
 2. Friction-fit 50 mm Rockwool RWA45 slabs tightly between studs, ensuring no gaps.
 3. Install 15 mm Gyproc SoundBloc plasterboards on both sides of the partition using resilient fixings.
 4. Stagger joints to reduce flanking transmission.
 5. Seal perimeter junctions with acoustic sealant to maintain airtightness.
 6. Tape, joint, and skim finish ready for decoration.

Suggested Product Specification (Material Sheet Format)

Component	Product Name	Specification & Performance
Acoustic Insulation	Rockwool RWA45 Acoustic Slab, 50 mm	Density 45 kg/m ³ , Euroclass A1 fire rated, 50 mm slab, airborne sound insulation ≥45 dB
Plasterboard Lining	Gyproc SoundBloc, 15 mm	High-density acoustic board, fire-rated, improves airborne sound insulation
Stud Framework	Acoustic Metal or Timber Stud (100 mm)	Galvanised metal studs, designed for partitions requiring enhanced acoustic performance

Heritage & Compliance Statement

- Works are internal only, with no impact on the external heritage façade.
- Acoustic partitions ensure compliance with Approved Document E by limiting airborne noise transfer between rooms.
- The system improves resident amenity in line with Newport LDP Policies GP2 (amenity) and GP7 (design quality).

• **Ceiling build-Up (Rooms between 1st Floor HM and 2nd Floor Residential)**

Requirement:

To ensure internal ambient noise levels within habitable rooms do not exceed ≤35 dB LAeq (daytime, 16hrs) and ≤30 dB LAeq (night-time, 8hrs) as per Condition 2 and the PJA Noise Impact Assessment (2022), the ceiling construction must achieve a minimum airborne sound insulation of 53 dB DnT,w + Ctr, which is 10 dB above Approved Document E standards.

Proposed Specification

Two ceiling build-up systems are proposed, both compliant with the acoustic uplift required by PJA (2022).

Option 1 – PJA Recommended MF Suspended Ceiling System

- Base Structure:
 - 200 mm hollowcore plank / reinforced concrete slab ($\geq 305 \text{ kg/m}^2$).
 - 65 mm screed layer ($\geq 80 \text{ kg/m}^2$).
- Suspended Ceiling Framework:
 - 100 mm MF (metal frame) suspended ceiling (e.g., British Gypsum GypLyner MF).
- Acoustic Insulation (Location & Method):
 - 50 mm Rockwool RWA45 mineral wool slab (density 45 kg/m^3).
 - Laid within the MF ceiling void, friction-fitted between metal studs to fully fill cavity without gaps.
- Ceiling Boards:
 - $1 \times 15 \text{ mm}$ Gyproc SoundBloc (EN 520 Type D, $\sim 12 \text{ kg/m}^2$).
- Overall ceiling build-up depth anticipated in the range of 100–120 mm (depending on final supplier specification), while ensuring compliance with the PJA Noise Impact Assessment and maintaining required internal ceiling heights for habitable rooms.
- Performance:
 - Airborne Sound Insulation: $\geq 53 \text{ dB DnT,w} + \text{Ctr.}$
 - Robust, long-term acoustic solution.

Option 2 – Alternative Resilient Bar System

- Base Structure:
 - 200 mm hollowcore plank / reinforced concrete slab ($\geq 305 \text{ kg/m}^2$).
 - 65 mm screed layer ($\geq 80 \text{ kg/m}^2$).
- Suspended Framework:
 - CMS Danskin IsoBar Resilient Bars (25–50 mm), fixed perpendicular to joists on underside of slab.
- Acoustic Insulation (Location & Method):
 - 50 mm Rockwool Flexi Acoustic Slab ($\sim 45 \text{ kg/m}^3$ density).
 - Slabs friction-fitted tightly between resilient bars to eliminate air gaps and ensure continuity of insulation layer.
- Ceiling Boards:
 - $2 \times 12.5 \text{ mm}$ Knauf Soundshield Plus or Gyproc SoundBloc.
 - Boards fixed to resilient bars with staggered joints, isolated from perimeter with 5 mm resilient edge strip.
- Overall ceiling build-up depth anticipated in the range of 40–75 mm (depending on final supplier specification), while ensuring compliance with the PJA Noise Impact Assessment and maintaining required internal ceiling heights for habitable rooms.
- Performance:
 - Airborne Sound Insulation: $52\text{--}55 \text{ dB DnT,w} + \text{Ctr.}$
 - Fully compliant with PJA uplift of +10 dB over Part E.

Installation Method (Applies to Both Options)

1. Preparation: Ensure hollowcore slab and screed are dry, clean, and free of defects.
2. Framework Fixing:

- a. Option 1: Install MF ceiling grid at 100 mm depth.
 - b. Option 2: Fix resilient bars perpendicular to joists/slab soffit.
3. Insulation Placement:
 - a. Insert Rockwool slabs (RWA45 or Flexi) into ceiling void/framing, tightly friction-fitted with no gaps, joints butted, and insulation cut neatly around service penetrations.
4. Boarding:
 - a. Fix Gyproc/KNAUF boards directly to MF frame or resilient bars.
 - b. Seal perimeter with acoustic mastic and 5 mm isolation strip.
5. Finishing:
 - a. Tape and joint plasterboard seams; decorate as required.
 - b. Ensure all penetrations (e.g. recessed lights) are fitted with acoustic hoods.

Heritage & Compliance Statement

- Acoustic ceiling works are entirely internal, with no impact to external heritage fabric.
- Both systems meet or exceed the PJA Noise Impact Assessment uplift requirements.
- Works comply with Condition 2, Condition 7, and Approved Document E.
- Newport LDP compliance: GP2 (amenity), GP7 (design quality), and SP9 (heritage protection).

Product Specification Summary

Component	Product Name	Specification & Performance
Acoustic Insulation (Opt 1)	Rockwool RWA45 Slab, 50 mm	Mineral wool, 45 kg/m ³ density, BS EN 13162, friction-fit into MF void
Acoustic Insulation (Opt 2)	Rockwool Flexi Slab, 50 mm	Flexible edge, mineral wool slab, ~45 kg/m ³ density, friction-fit between resilient bars
Suspended Ceiling (Opt 1)	British Gypsum GypLynr MF Ceiling	100 mm MF metal ceiling grid
Resilient Bar (Opt 2)	CMS Danskin IsoBar Resilient Bar or British Gypsum	25–50 mm resilient bar system, vibration isolation
Boards	Gyproc SoundBloc / Knauf Soundshield	12.5–15 mm high-density acoustic plasterboard

- **Doors:**

1. All internal doors upgraded to FD30S fire-rated acoustic doors with perimeter seals and drop-down thresholds (Premdor or equivalent).

This system ensures compliance with Condition 2 noise limits (≤ 35 dB LAeq day / ≤ 30 dB LAeq night) and provides resilience against noise transfer from the ground-floor retail units.

Secondary Glazing (Acoustic)

Objective:

Achieve internal ambient noise targets (≤ 35 dB LAeq, 16h day; ≤ 30 dB LAeq, 8h night) and at

least 33 dB Rw+Ctr - 35 dB Rw+Ctr contribution from the glazing system, in line with the PJA Noise Impact Assessment and Condition 2.

Product & Configuration

- Supplier (UK): Granada Secondary Glazing (Heritage Range) or Selectaglaze (Heritage Series).
Both are UK-based manufacturers supplying slimline heritage secondary glazing with published acoustic test data.
- Frame Type (match existing):
 1. Sash primary windows: Vertical sliding secondary units.
 2. Casement primary windows: Hinged open-in secondary units.
- Secondary Unit Glass: 10 / 6 / 4 sealed IGU
 1. 10 mm outer pane (toughened float glass)
 2. 6 mm sealed cavity (air)
 3. 4 mm inner pane (float glass)
 4. Total unit thickness: 20 mm
 5. Optimised for mass–air–mass resonance in combination with the primary glass.
- Trickle Vents (integrated):
 1. Acoustic trickle vents integrated within the secondary frame only (not the external window).
 2. Options: Granada “Acoustic Trickle Vent” or Selectaglaze vent kit with Dn,e,w up to 40 dB (closed).
 3. Internal slot vent baffles only — no external canopy, avoiding any work to the external façade or existing window.

Location

- Installation: Internally, to all habitable-room windows (first-floor front and rear elevations).
- Air Gap to Primary Window:
 1. ≥ 100 mm clear cavity between the external (primary) glazing and the new secondary unit (≥ 75 mm minimum where constrained).
 2. This cavity is critical to achieving the 33+ dB Rw+Ctr performance.

Acoustic Performance Rationale

- System Type: Mass–air–mass (primary single glazing + 100 mm cavity + secondary IGU).
- Performance:
 1. Secondary IGU (10/6/4): Rw 37–40 dB (lab tested).
 2. Composite system: Rw+Ctr ≥ 33 –35 dB across façade element.

- Compliance: Ensures Condition 2 internal levels are met with windows closed:
 1. ≤ 35 dB LAeq,16h (day)
 2. ≤ 30 dB LAeq,8h (night)

Frame & Seals

- Frames: Slimline aluminium, powder-coated (RAL 9005 matt black or to match heritage architraves).
- Seals: EPDM/Q-Lon continuous compression seals + acoustic perimeter sealant.
- Fixings: Concealed within internal reveals, ≤ 400 mm centres.
- Ironmongery: Heritage slimline catches, lockable as required.

Installation Method

1. Survey: Measure primary frames and set out depths to maintain ≥ 100 mm cavity.
2. Grounds: Treated timber/aluminium grounds isolated with 3–6 mm PE foam tape.
3. Frame Fixing: Mechanical fixings @ ≤ 400 mm centres, ≤ 150 mm from corners.
4. Perimeter Seal: Backing rod + dual acoustic sealant beads around frame perimeter.
5. Vent Installation: Acoustic trickle vent fitted within the secondary glazing head profile, baffled to ensure no façade penetration.
6. Finish: Architraves matched to existing; trims sealed airtight.

Condensation & Maintenance

- Condensation: Internal acoustic trickle vents provide background ventilation while retaining acoustic integrity.
- Thermal breaks/warm-edge spacers minimise cold bridging.
- Cleaning: Vertical sliders tilt-in; hinged units open fully for safe access.

Fire & Egress

- No reduction in escape window function, quick-release hinges used where required to maintain Building Regulations Part B compliance.

Compliance

- Meets PJA minimum acoustic aim (≥ 33 dB Rw+Ctr).
- Satisfies Condition 2 (internal ambient noise levels).
- Fully reversible and heritage-sensitive (no external alteration).
- Reduces need for bedroom MVHR units as ventilation provided discreetly via acoustic trickle vents.

6. Waste & Refuse Storage

The proposed HMO development will provide adequate refuse and recycling storage in line with Newport City Council's requirements and best practice for shared accommodation.

Feature & Justification

- Two internal bin stores- one located in the kitchen for immediate day-to-day use, and a second positioned in a communal area close to the living/dining space for resident convenience. This ensures bins are easily accessible to all occupants without compromising the living environment. Both stores will use sealed, fire-resistant, and hygienic containers to minimise odour and maintain amenity.
- Kitchen Storage- Daily-use recycling and general waste bins will be integrated within the kitchen, allowing residents to dispose of food and packaging waste conveniently while cooking or dining.
- Secondary Communal Store - A second internal store near the communal living area will provide additional capacity and encourage proper waste segregation. This store will be designed as a small, enclosed refuse cupboard, ventilated and fire-safe, avoiding any negative impact on living conditions or blocking fire escape route.
- External Collection Point- In line with the previously approved application, all bins will be transferred to a temporary external collection point at the front entrance on designated collection days only. This ensures straightforward kerbside access for waste services without permanent visual clutter on the street scene.

Compliance

This arrangement ensures:

- Waste is stored in a hygienic, safe, and accessible manner for all residents.
- Amenity spaces (living rooms) are kept free of refuse bins, preserving their function as communal leisure space.
- Refuse storage complies with HMO licensing guidance, Policy SP9, Policy GP2 (amenity), and Policy GP7 (health & safety) of the Newport LDP 2011–2026.



Fig 3 - An illustration of the landing area that would serve as the communal lounge.



Fig 4 - View from ground floor staircase and entrance which is proposed to be retained.



Fig 5 - View from landing and staircase at first floor.



Fig 6 - View of the existing 'Room 3'.

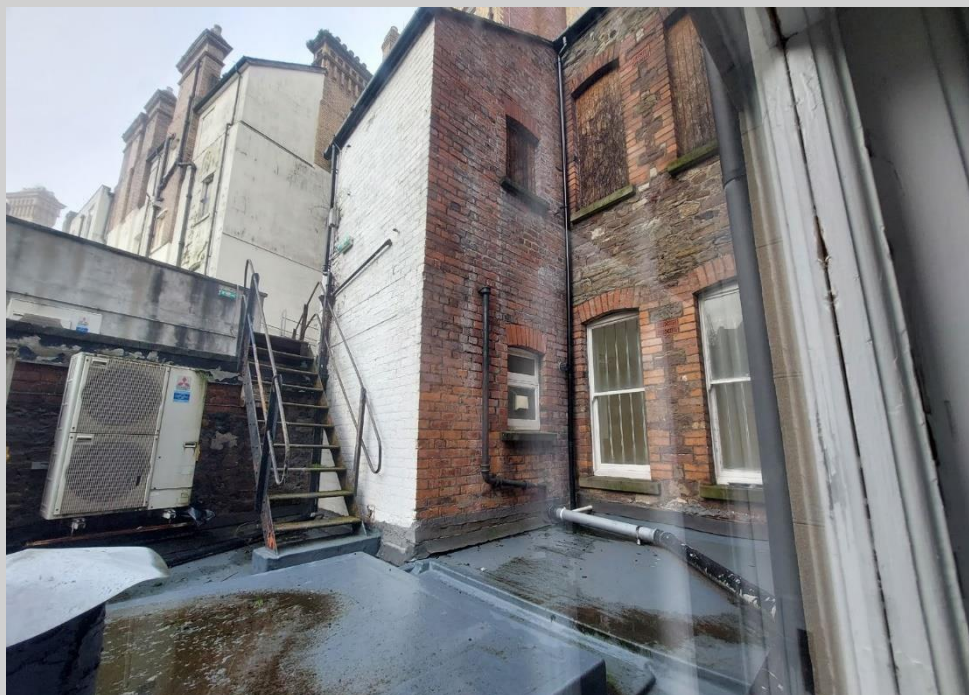


Fig 7 - View of the courtyard to the rear of Unit 3, depicting existing soil vent pipes and downpipes.

7. Conclusion

The amendments proposed under this Section 73 application are minor, justified, and improve the safety, feasibility, and compliance of the approved scheme.

- The scheme remains a 6-bedroom HMO with no increase in occupancy.
- No adverse impact arises on the building's external appearance or the surrounding heritage setting.
- Structural safety has been enhanced by retaining the load-bearing wall.
- Compliance with noise, drainage, and waste conditions has been demonstrated through robust technical specifications.

We respectfully request that Newport City Council approves this Section 73 application and substitutes the revised drawings accordingly.

Appendix A – Materials & Technical Specification Schedule

(175A Commercial Street, Newport – Section 73 Variation)

Element / Condition	Proposed Product / System	Technical Specification	Supplier / Data Source	Compliance Notes
Condition 5 – Mechanical Extraction Ventilation (grilles & ducts)	External Grilles – Nuaire Heritage Vent Grilles / Rytons A1 Louvre Grilles	• Size: Ø100–300 mm or 9 × 6 in. • Finish: RAL 9005 matt black (heritage). • Flush-mounted in rear elevation mortar joints, slim bezel, insect mesh.	Nuaire UK / Rytons Ventilation	Visually unobtrusive, rear elevation only. Preserves heritage façade (Policy SP9).
	Inline Duct Silencers – Titon SF Xtra Sound Attenuator	• Acoustic performance: up to 44 dB Dn,e,w (C;Ctr) when open, 55 dB Dn,e,w when closed. • Installed internally on MEV ductwork.	Titon UK – Datasheet	Meets Condition 2 acoustic targets (≤35 dB LAeq day / ≤30 dB LAeq night). Required per PJA (2022).
	MEV Silencers – Nuaire Q-Acoustic Silencers (or equivalent)	• Length 600–1200 mm. • Noise reduction: ≥10–15 dB(A).	Nuaire UK	Internal only; ensures low breakout noise from extract terminations.
Condition 6 – Soil Pipes & Rainwater Goods	Soil Pipework – Marley 110 mm Soil & Vent Pipe (uPVC)	• BS EN 1329-1 certified. • Diameter: 110 mm. • Installed internally, boxed in studwork with fire/acoustic-rated lining. • Connections routed to existing rear SVP.	Marley Plumbing & Drainage – Datasheet	Internal routing avoids external SVPs. Matches existing service runs.
	Rainwater Goods – Marley Alutec	• Cast-iron effect uPVC. • Gutters: 112 mm half-round.	Marley Alutec – Product Guide	Only used if replacement required. Installed on rear elevation

Element / Condition	Proposed Product / System	Technical Specification	Supplier / Data Source	Compliance Notes
	Traditional Heritage Range	• Downpipes: 68 mm round profile with traditional shoe outlet. • Brackets: stainless steel rise & fall, powder coated. • Finish: heritage black.		only, no works to principal façade.
Condition 7 – Acoustic Floors	Option 1 – Floating Timber Floor with Cradle & Batten	• Base: 200 mm hollowcore plank $\geq 305 \text{ kg/m}^2$. • 65 mm screed $\geq 80 \text{ kg/m}^2$. • Resilient cradle & batten system ($\geq 45 \text{ mm}$). • 25 mm Rockwool Acoustic Mineral Wool ($10\text{--}60 \text{ kg/m}^3$) fitted between battens. • 18 mm T&G floorboards.	Rockwool / Robust Details	Achieves $\geq 53 \text{ dB DnT,w} + \text{Ctr}$ airborne insulation (10 dB above Part E).
	Option 2 – Regupol 4515 Multi Acoustic Underlay	• Base: 200 mm hollowcore plank $\geq 305 \text{ kg/m}^2$. • 65 mm screed $\geq 80 \text{ kg/m}^2$. • 6 mm Regupol 4515 Multi recycled rubber mat. • Dynamic stiffness $\leq 15 \text{ MN/m}^3$. • Impact reduction: up to 22 dB. • 18 mm moisture-resistant chipboard overlay (floating). • Perimeter	Regupol (CMS Danskin) – 4515 Multi Datasheet	Alternative system; achieves same acoustic uplift.

Element / Condition	Proposed Product / System	Technical Specification	Supplier / Data Source	Compliance Notes
		isolated with 5 mm resilient edge strip.		
Condition 7 – Acoustic Ceilings	Option 1 – MF Suspended Ceiling (PJA Recommended)	• Base: 200 mm concrete slab + 65 mm screed. • Framework: 100 mm MF metal ceiling. • Acoustic Insulation: 50 mm Rockwool RWA45 (45 kg/m³). • Ceiling Board: 1 × 15 mm Gyproc SoundBloc. • Depth: 100–120 mm.	Rockwool UK – RWA45 Datasheet British Gypsum – Gyproc SoundBloc	Meets PJA target of ≥53 dB DnT,w + Ctr. Internal works only.
	Option 2 – Resilient Bar Ceiling Build-Up	• Base: 200 mm concrete slab + 65 mm screed. • Framework: CMS Danskin IsoBar Resilient Bars (25–50 mm). • Acoustic Insulation: 50 mm Rockwool Flexi Acoustic Slab (45 kg/m³). • Ceiling Boards: 2 × 12.5 mm Knauf Soundshield Plus or 1 × 15 mm Gyproc SoundBloc, staggered joints. • Perimeter Detail: 5 mm resilient edge strip. • Anticipated depth: 40–75 mm	Rockwool UK – Flexi Slab Datasheet CMS Danskin IsoBar – Datasheet	Alternative compliant system. Maintains acoustic performance with minimal ceiling loss.
Condition 7 – Acoustic Walls	130 mm Stud Wall Acoustic Partition	• Stud frame: 100 mm. • Insulation: 50 mm Rockwool	Rockwool UK / British Gypsum	Exceeds Part E & PJA uplift requirement.

Element / Condition	Proposed Product / System	Technical Specification	Supplier / Data Source	Compliance Notes
		Acoustic Slab (45–60 kg/m ³). • Boards: 1 × 15 mm SoundBloc each side. • Total build-up: 130 mm.		
Condition 7 – Secondary Glazing (Noise & Amenity)	Granada Secondary Glazing (Heritage Range) or Selectaglaze (Heritage Series).	1. 10 mm outer pane (toughened float glass) 2. 6 mm sealed cavity (air) 3. 4 mm inner pane (float glass)	Granada Secondary Glazing (Heritage Range) or Selectaglaze (Heritage Series).	Delivers ≤30 dB LAeq night & ≤35 dB LAeq day indoors. Heritage-sensitive.
Internal Bin Storage – Kitchen	Purpose-built Cabinetry (Häfele Waste Solutions)	• Size: 1.2 m (W) × 0.6 m (D) × 0.9 m (H). • Triple segregation: General / Recycling / Food.	Häfele UK – Kitchen Waste Systems	Meets HMO waste guidance.
Internal Bin Storage – Communal Living Area	Leaffield Envirobin Range	• Size: 1 m (W) × 0.7 m (D) × 1.0 m (H). • 3-bin segregation.	Leaffield Environmental – Envirobin	Provides additional waste point.