

## Planning, Green Infrastructure and Drainage Statement

### Proposed Conversion to House in Multiple Occupation at 78 Caerau Road, Newport (Resubmission)

#### 1. Introduction

This Planning, Green Infrastructure and Drainage Statement has been prepared in support of a revised planning application for the conversion of 78 Caerau Road to a House in Multiple Occupation (HMO).

The application follows the refusal of planning permission under reference 25/1101. The reasons for refusal, as set out within the Council's Delegated Decision Report, have been carefully reviewed and have directly informed the amendments now proposed.

The revised scheme has been developed with a clear focus on responding positively to those concerns, not only by addressing specific technical issues identified by the Local Planning Authority, but also by improving the overall quality, functionality and management of the accommodation. The intention has been to ensure that the proposal can be properly assessed against the development plan as a whole, with particular regard to living conditions, amenity, servicing arrangements and the policy framework relating to Houses in Multiple Occupation.

#### 2. Site Context and Principle of Development

The application site is located within the defined settlement boundary of Newport and forms part of an established urban area characterised by a mix of residential properties interspersed with commercial uses and buildings of varying scale and footprint.

The surrounding townscape is therefore not uniform in character and includes a range of plot sizes, building forms and land uses. This varied context is an important consideration when assessing both the design of the proposal and the application of certain policy tools, including the HMO concentration assessment.

As confirmed within the previous officer assessment, the principle of residential use in this location is acceptable and accords with Policy SP1 of the Newport Local Development Plan (LDP). The proposal does not introduce a new land use into the area but instead represents the continued residential use of an existing building, albeit in a different format.

The site benefits from good accessibility to local services, employment opportunities and public transport, and therefore represents a sustainable location for residential development. In this respect, the proposal aligns with the wider objectives of Planning Policy Wales and Future Wales, which seek to make efficient use of land within settlements and support appropriate forms of residential accommodation in accessible urban areas.

#### 3. Description of the Revised Proposal

The revised proposal retains the overall concept of converting the existing property into an HMO; however, a number of targeted amendments have been introduced in response to the issues identified within the previous refusal.

The most notable change relates to the internal configuration of the ground floor, where **Unit 2 has been reduced to a single occupancy unit**. This adjustment has the effect of reducing the overall intensity of use within the building, whilst also allowing for an improved internal layout that facilitates better circulation and usability.

In addition, **direct internal access to the rear garden is now provided via Unit 2**, which removes the need for external routes and improves the functionality of the property for future occupants. This change also assists in ensuring that the rear garden can be properly used as a shared amenity space.

The scheme has also been amended to relocate **cycle storage and refuse storage to the rear garden**, where they are now positioned in a more discreet and appropriate location. These facilities are

supported by the provision of a **lockable access gate**, which will enable the rear area to be securely managed and will help prevent unauthorised access. A modest **visitor cycle stand is retained to the front**, ensuring that short-stay provision remains convenient without detracting from the character of the frontage.

Internally, the **shared living space has been increased to approximately 22sqm**, providing a significantly improved level of communal accommodation that is capable of comfortably serving all occupants of the property. This represents a substantial improvement over the previous arrangement and responds directly to the concerns raised in relation to living standards.

Finally, the submission now includes **detailed drawings of rear and side boundary treatments**, which clarify how the amenity space will be defined, secured and used.

Taken together, these amendments result in a more balanced and well-considered scheme that addresses the key issues previously identified.

#### 4. Planning Policy Context

The development has been assessed against the relevant provisions of:

- **Future Wales – The National Plan 2040**
- **Planning Policy Wales (Edition 12)**
- **Newport Local Development Plan 2011–2026**
- Relevant Supplementary Planning Guidance (SPG), including:
  - Houses in Multiple Occupation
  - Waste Storage and Collection
  - Parking Standards
  - Wildlife and Development

The key policies identified within the officer's report include SP1, GP2, GP4, GP6, H8, T4 and W3. These policies are considered below.

#### 5. Assessment Against Relevant Policies

##### Policy SP1 – Sustainability

Policy SP1 supports development within settlement boundaries where it contributes to the creation of sustainable communities and makes efficient use of land.

In this case, the proposal relates to the re-use and adaptation of an existing building within a well-established urban area. It does not require the release of greenfield land, nor does it introduce a use that would be out of keeping with the surrounding context.

Given the site's accessible location and the nature of the development, the proposal represents an efficient and sustainable form of development that aligns with the objectives of Policy SP1 and national planning policy.

##### Policy GP2 – General Amenity

Policy GP2 requires that development provides an acceptable standard of amenity for both existing and future occupants and does not result in unacceptable impacts.

The previous refusal identified concerns relating to the quality of internal accommodation, the relationship between servicing areas and habitable rooms, and the lack of clarity regarding amenity space.

The revised scheme has been specifically designed to address these matters. The reduction in occupancy of Unit 2, together with the reconfiguration of the internal layout, has resulted in a more functional and less intensive arrangement. The provision of a **22sqm shared living space** ensures that adequate communal facilities are available, thereby supporting a good standard of living for future occupants.

The relocation of cycle and refuse storage to the rear of the property removes potential sources of noise, disturbance and visual clutter from the frontage and ensures that such facilities are appropriately distanced from habitable room windows. The relationship between these elements and Unit 2 has therefore been significantly improved.

In addition, the provision of clearly defined rear amenity space, supported by detailed boundary treatments, ensures that occupants have access to usable outdoor space that is both secure and private.

Overall, the revised scheme provides a materially improved standard of accommodation and is considered to comply with the requirements of Policy GP2.

#### **Policy GP4 – Highways and Accessibility**

Policy GP4 requires that development provides safe and suitable access arrangements and does not have an unacceptable impact on the highway network.

The Highway Authority previously indicated that, subject to the appropriate siting of cycle and refuse storage, the proposal would be acceptable in highway terms .

The revised scheme addresses this by relocating such facilities to the rear of the property, thereby ensuring that the frontage remains unobstructed and that access arrangements are not compromised. The existing access to the site remains unchanged.

Given the site's sustainable location and the characteristics of HMO occupancy, the proposal is considered acceptable in highway terms and compliant with Policy GP4.

#### **Policy GP6 – Quality of Design**

Policy GP6 seeks to ensure that development is of a high standard of design and responds appropriately to its context.

The revised scheme does not involve any significant alterations to the external appearance of the building and therefore maintains the established character of the street. The removal of storage from the frontage represents a clear improvement in visual terms, whilst the relocation of servicing to the rear results in a more discreet and appropriate arrangement.

The proposal is therefore considered to represent a suitable design response that accords with Policy GP6.

#### **Policy H8 – Houses in Multiple Occupation**

Policy H8 seeks to ensure that HMOs do not result in an overconcentration that would harm the character of the area, undermine social cohesion or give rise to unacceptable impacts on residential amenity.

The previous refusal identified that the proposal would exceed the 15% threshold set out in the HMO SPG, based on a 50m radius assessment that included 22 properties .

The revised application has carefully considered this assessment and the role of the threshold within the decision-making process. Whilst the threshold is clearly an important material consideration, it is intended as a guide rather than a definitive limit. The policy test under H8 requires a broader assessment of whether the proposal would, in practice, result in a harmful concentration of HMOs.

In this instance, it is considered that the 50m radius does not provide a fully representative assessment of the local context. The site is located within an area that includes buildings of varying scale and footprint, including commercial premises, which reduces the number of qualifying residential properties captured within the radius. As a consequence, the sample used in the previous assessment is relatively small.

The HMO SPG expressly recognises that, in areas characterised by larger plots or more dispersed development patterns, a 50m radius may capture only a limited number of properties and that the results should therefore be interpreted with caution. This is directly applicable in this case.

A sample of 22 properties is inherently sensitive to change, such that the inclusion of a single additional HMO results in a notable percentage increase. In such circumstances, the resulting figure should not be viewed in isolation but should instead be considered alongside the wider spatial context and the actual impacts of the proposal.

A review of the Council's HMO register indicates that licensed HMOs within the wider Allt-yr-yn area are distributed across a broad range of streets and are not concentrated around the application site. The available evidence does not suggest that the Caerau Road locality is characterised by a dominant or established cluster of HMOs.

The revised scheme itself also reduces the potential for any adverse effects. The intensity of use has been moderated through the reconfiguration of Unit 2, the internal layout has been improved, and the communal living space has been increased. The relocation of servicing to the rear, together with the introduction of secure management measures such as a lockable gate, ensures that the development would operate in an orderly and controlled manner.

Importantly, the proposal would not result in any significant external changes to the building, and the use would remain residential in character. There is no evidence to suggest that the development would give rise to the types of impacts typically associated with harmful concentrations of HMOs, such as visual degradation, unmanaged waste, increased disturbance or a fundamental change in neighbourhood character.

When considered in the round, and having regard to the limitations of the 50m assessment in this particular context, the dispersed pattern of HMOs within the wider area and the improvements made to the scheme, it is considered that the proposal would not result in a harmful overconcentration and is therefore compliant with Policy H8.

#### **Policy T4 – Parking**

Policy T4 requires development to provide appropriate levels of parking, having regard to location and accessibility.

The Highway Authority previously noted that, whilst the proposal may not fully meet standard requirements, it would be acceptable given the site's sustainable location and the characteristics of HMO occupancy.

The revised scheme does not alter this position and remains acceptable in parking terms.

#### **Policy W3 – Waste Management**

Policy W3 requires that development provides appropriate facilities for the storage and collection of waste.

The revised scheme provides dedicated refuse storage within the rear garden, ensuring that bins are located in a secure and discreet location that does not detract from the character of the street. This represents a clear improvement over the previous arrangement and ensures compliance with Policy W3.

## **6. Green Infrastructure Statement**

The site comprises previously developed land with limited ecological value; however, the proposals retain the rear garden as usable green space and provide opportunities for enhancement through planting, improved management and bat and bird boxes.

Whilst the scale of development does not necessitate significant intervention, the scheme aligns with the principles of green infrastructure set out in national policy by maintaining and supporting functional green space within the site.

## **7. Drainage Statement**

The proposed development does not involve any increase in building footprint or impermeable area.

In line with the previous Welsh Water consultation response, foul drainage will connect to the existing sewer network and surface water will continue to be managed on site.

Given that the proposal does not result in any increase in runoff, it is not considered to place any additional burden on existing drainage infrastructure.

## **8. Planning Obligations**

The applicant confirms a willingness to enter into a Unilateral Undertaking to secure any required contribution towards affordable housing, thereby addressing the previous reason for refusal.

## **9. Conclusion**

The revised scheme represents a comprehensive and proportionate response to the previous refusal, addressing the concerns raised in relation to living conditions, layout, servicing and amenity.

The proposal retains a residential use within a sustainable location, improves the quality of accommodation, and incorporates appropriate management measures to ensure that the development would function effectively without giving rise to unacceptable impacts.

When assessed against the development plan as a whole, and having regard to all material considerations, the proposal is considered to be acceptable.

Planning permission is therefore respectfully sought.