



PLANNING STATEMENT

PROPOSAL: CHANGE OF USE FROM A 3 BEDROOM DWELLING (C3 USE) TO A 4 BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE) (RESUBMISSION OF PLANNING REFERENCE: 25/0496)

CLIENT: MR GRAINGER JONES

SITE: 28 BRYNGLAS ROAD, NEWPORT, NP20 5RZ

DATE: MAY 2026



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1.0 Introduction

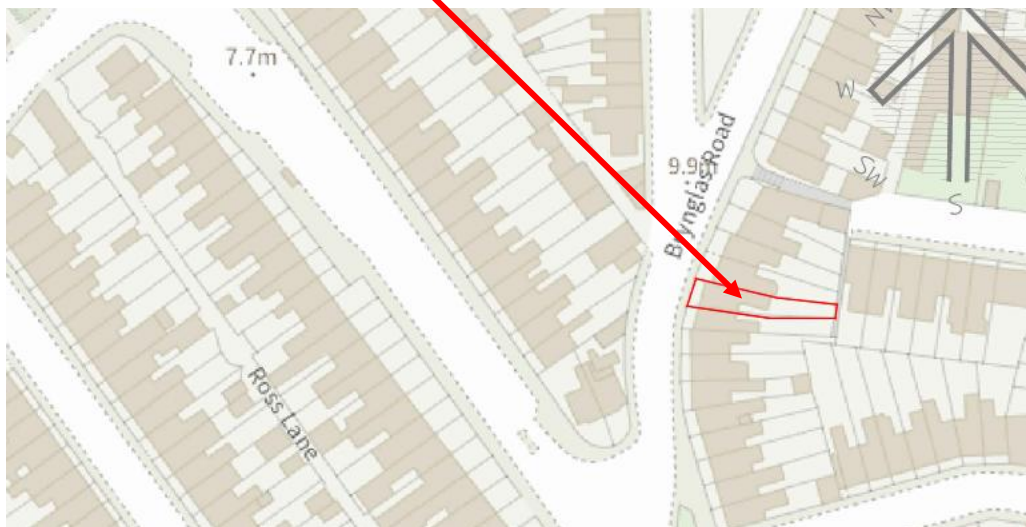
- 1.1 This Planning Statement has been prepared by LRJ Planning Ltd on behalf of the applicant to accompany the full planning application for the change of the use of 28 Brynglas Road, Newport from a three bedroom dwelling to a four bedroom house in multiple occupation (C4 use).
- 1.2 The application is a resubmission of a previously refused planning application (planning reference: 25/0496) and a subsequently dismissed appeal (appeal reference: Appeal reference: CAS-04663-K4D5H0). The two main issues in the determination of the appeal related to highway safety and the living conditions for future occupants. The Inspector was satisfied that there was no harm to highway safety, but was of the view that the limited and poorly configured useable floor space of the front two bedrooms would materially reduce their usability and quality, resulting in an inadequate standard of accommodation for prospective occupiers. As a result, this scheme has been amended, so that there is no reconfiguration of the front bedroom as two bedrooms.
- 1.3 This Planning Statement describes the proposals, related key material considerations in determining the application, and benefits which will be delivered. Furthermore it reviews and demonstrates compliance with the approved relevant development plan policies and national planning policy.
- 1.4 This statement should be read in conjunction with the following plans and documents that accompany the application and comprise:
 - Application form and certificates;
 - Site location plan; and
 - Existing and proposed floor plans.



2.0 Site Description

- 2.1 The application site comprises a two-storey terraced property, which is surrounded by properties of a similar vintage. The property itself consists of an existing three bedroom dwelling that is positioned on the eastern side of Brynglas Road. The property benefits from a rear garden area.

Figure 1 – Site location



- 2.2 The property occupies a sustainable location within the settlement boundary, as well as being within walking distance of a bus route with regular services.

3.0 Planning Designations

- 3.1 The Site is not subject to any designations as defined by the Council's adopted Policies Map.
- 3.2 The Site is not within, or immediately adjacent to, designations for valued landscapes, such as local landscape designations, AONBs or National Parks.
- 3.3 There are no designated heritage assets within the vicinity of the site.



4.0 Background and Proposal

- 4.1 This full planning application seeks permission for the change of use of 28 Brynglas Road, Newport, from a three-bedroom dwellinghouse (Use Class C3) to a four-bedroom House in Multiple Occupation (Use Class C4).
- 4.2 The application has been submitted following the refusal of a previous scheme under planning reference 25/0496 and the subsequent dismissal of an appeal (Appeal Reference: CAS-04663-K4D5H0). In determining the appeal, the Inspector identified two principal matters for consideration: highway safety and the living conditions of future occupants.
- 4.3 The Inspector concluded that the proposal would not result in harm to highway safety. However, concerns were raised regarding the limited size and poor configuration of the two proposed front bedrooms, with the resulting usable floor space considered insufficient to provide an acceptable standard of accommodation for future occupiers.
- 4.4 In response to these concerns, the current proposal has been amended to remove the previous subdivision and reconfiguration of the front bedroom into two separate rooms. The revised scheme therefore avoids the layout issues identified in the earlier decision while retaining the proposed change of use to a four bedroom HMO.

5.0 Planning Policy Context

- 5.1 The planning policy framework for the determination of this application is provided by the content and scope of National Planning Policy, which is contained within the



Wales Spatial Plan, Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the Development Plan for the local area.

Planning Policy Wales

- 5.2 PPW identifies that as part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs) and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement. PPW adds that:

“A broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor’s surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.”

Development Plan

- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”



5.4 Part 2 (Sustainable Development) of the Planning (Wales) Act 2015 says the following:

1. This section applies to the exercise by the Welsh Ministers, a local planning authority in Wales or any other public body—

(a) of a function under Part 6 of PCPA 2004 in relation to the National Development Framework for Wales, a strategic development plan or a local development plan;

(b) of a function under Part 3 of TCPA 1990 in relation to an application for planning permission made (or proposed to be made) to the Welsh Ministers or to a local planning authority in Wales.

2. The function must be exercised, as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015 for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.

5.5 The Newport Local Development Plan (LDP) to 2015 is the development plan for the purposes of the Planning and Compulsory Purchase Act 2004. The relevant policies are referred to below.

- SP1 Sustainability;
- GP2 General Amenity;
- GP4 Highways and Accessibility;
- H8 Self Contained Accommodation and Houses in Multiple Occupation; and
- T4 Parking.



5.6 The Council's Supplementary Planning Guidance for Houses in Multiple Occupation (2016) offers further guidance in respect of the proportion of HMOs within a 50m radius not exceeding 10%.

6.0 Planning Appraisal

6.1 This section seeks to highlight the main issues relevant to the determination of the application and assess the scheme against the local and national planning policies referenced in section 5.0 above.

6.2 The main issues that are considered to be relevant in this case include:

- The principle of development in relation to land use planning policy and sustainable development;
- The effect the proposal will have on the character and appearance of the area;
- The impact on the amenity of neighbouring properties;
- Living conditions for future occupants
- Parking and servicing arrangements.

i) Principle of Development

6.3 Both local and national planning policy supports the provision of sustainable development and promotes the provision of development within the defined urban boundary. Policy SP1 of the LDP seek the efficient use of land within the urban boundary and there is a presumption in favour of sustainable development, subject to other material considerations.

6.4 Policy H8 of the LDP identifies that:



“Within the defined settlement boundaries, proposals to subdivide a property into self contained accommodation, bedsits or a house in multiple occupation will only be permitted if:

- i) the scale and intensity of use does not harm the character of the building and locality and will not cause an unacceptable reduction in the amenity of neighbouring occupiers or result in on street parking problems;*
- ii) the proposal does not create an over concentration of houses in multiple occupation in any one area of the city which would change the character of the neighbourhood or create an imbalance in the housing stock;*
- iii) adequate noise insulation is provided;*
- iv) adequate amenity for future occupiers.”*

6.5 The Council’s SPG advises that planning applications will not be supported where it would take the proportion of HMOs within a 50m radius of the application building above a specified limit. In this case the limit is 10% and the proposal satisfies this 10% threshold. As a result, the proposal accords with Policy H8 of the LDP and the 10% threshold prescribed in the Council’s SPG. The proposal will not result in an over concentration of HMOs within the area. Given this position the principle of the proposed development is acceptable, subject to the other material considerations that will be discussed below.

ii) Character and Appearance

6.6 Policy GP2 of the LDP seeks to promote good design and that new development must have full regard to the context of the local natural and built environment, and promotes the use of local distinctiveness through sympathetic design and material selection.



- 6.7 As part of the proposed development, no external alterations are proposed so the proposal will not result in any material harm to the character and appearance of the area.

iii) Neighbour Amenity

- 6.8 Policy GP2 and H8 of the LDP seeks to ensure that proposals would not have a detrimental impact on the amenity of neighbouring properties.
- 6.9 The surrounding area is urban and built up with tight grain development close to a raft of local amenities. There is no evidence to suggest that the use of the property as an HMO would have any impact on neighbour amenity. The proposed use is commensurate to the size of the property, and would not undermine the amenity of the neighbouring properties, through any increase in noise and disturbance.
- 6.10 Overall, the proposal would not materially harm the amenity of neighbouring properties and therefore accords with Policies GP2 and H8 of the LDP.

iv) Living Conditions

- 6.11 Policy H8 and Policy GP2 of the Local Development Plan (LDP) require that development provides an adequate level of amenity for future occupiers. In addition, the Council's House in Multiple Occupation Supplementary Planning Guidance (HMO SPG) emphasises that rooms should be arranged and designed to maximise living standards.
- 6.12 In the previous scheme, concerns were raised regarding the subdivision of the front first floor room, which resulted in two bedrooms. The Inspector opined that the configuration of these rooms, including the influence of the bay window, chimney breast, and constrained access arrangements, created awkward and



fragmented layouts. This significantly reduced the amount of functional and usable floor space, leading to concerns that the rooms would not comfortably accommodate essential furniture or provide an acceptable standard of living accommodation.

- 6.13 The revised proposal has directly addressed these concerns through the removal of the subdivision of the front bedroom. As a result, the number of bedrooms has been reduced, and the original front room has been retained as a single, more generously proportioned and functional space. This ensures that the room benefits from an improved layout, free from the constraints and inefficiencies previously identified.
- 6.14 Consequently, all bedrooms within the property now provide sufficient usable floor space and a more regular configuration, allowing for the appropriate placement of furniture and comfortable day to day use. The revised internal arrangement therefore aligns with the requirements of the HMO SPG in terms of room usability and quality.
- 6.15 Furthermore, the scheme continues to provide a good standard of shared amenity, including a suitably sized communal living area, adequate natural light to habitable rooms, external amenity space, and appropriate servicing arrangements such as bin and cycle storage. While it is acknowledged that HMO licensing operates as a separate regulatory regime, the revised layout also reflects the intent of both planning policy and good design practice in delivering satisfactory living conditions.
- 6.16 Overall, by reducing the number of bedrooms and improving the configuration and usability of internal spaces, the proposal overcomes the deficiencies identified in the previous appeal decision and would provide an acceptable standard of accommodation for future occupiers, in compliance with LDP Policies H8 and GP2 and the guidance set out in the HMO SPG.



v) Parking and Highway Safety

- 6.17 Policy GP2 of the Local Development Plan (LDP) requires that development does not have an unacceptable impact on highway safety or local amenity, while Policies GP4 and T4 seek to ensure appropriate parking provision in accordance with the Council's adopted standards. Policy H8 also requires that proposals for Houses in Multiple Occupation (HMOs) do not result in on-street parking problems. These aims are reinforced by the Council's Parking Standards SPG and HMO SPG.
- 6.18 In the determination of the previous appeal, the Inspector carefully considered the implications of the proposal on highway safety and parking. It was acknowledged that the site is located within an area of high parking demand, characterised by terraced housing with limited off-street parking provision. While on-street parking stress was observed to be high, the Inspector ultimately concluded that the proposal would not materially increase parking demand and would therefore not result in a harmful impact on highway safety.
- 6.19 A key factor in this conclusion was the highly sustainable location of the site. The property is situated within close proximity to Malpas District Centre, with access to a range of shops, services and facilities, and is well served by public transport, including nearby bus stops. The site is also within reasonable walking and cycling distance of Newport city centre. As such, future occupiers would have realistic and convenient alternatives to private car use, consistent with the objectives of Planning Policy Wales to reduce reliance on private vehicles and promote sustainable travel choices.
- 6.20 The revised proposal further strengthens this position. The number of bedrooms has been reduced compared to the previously proposed scheme, thereby lowering the overall intensity of occupation. As a result, the potential demand for on-street



parking associated with the development would be reduced accordingly. This reinforces the Inspector's earlier finding that the development would be unlikely to materially increase parking pressures within the surrounding area.

- 6.21 In addition, the proposal continues to provide cycle storage, supporting sustainable modes of transport and further reducing reliance on private vehicles. Given the site context and accessibility, the development is likely to appeal to occupants who do not rely on car ownership as a primary mode of travel.
- 6.22 Overall, having regard to the Inspector's previous conclusions and the reduced scale of the current proposal, it is considered that the development would not materially increase parking demand or adversely affect highway safety. The proposal therefore complies with LDP Policies GP2, GP4, T4 and H8, as well as the guidance set out in the Parking Standards SPG and HMO SPG.

7.0 Conclusion

- 7.1 This application seeks full planning permission for the change of use of 28 Brynglas Road from a three-bedroom dwelling (Use Class C3) to a four-bedroom House in Multiple Occupation (Use Class C4). The proposal represents a revised scheme submitted in response to the refusal of the previous application and the subsequent dismissed appeal.
- 7.2 The current scheme has been carefully amended to directly address the concerns raised by the Inspector, particularly in relation to living conditions. The removal of the subdivision of the front bedroom has resulted in a more functional and appropriately configured internal layout, ensuring that all bedrooms provide an adequate level of usable space and a satisfactory standard of accommodation for future occupiers. The proposal therefore complies with the requirements of LDP Policies GP2 and H8, as well as the guidance set out in the HMO SPG.



- 7.3 In terms of highway safety and parking, the Inspector previously concluded that the development would not result in harm, despite existing parking pressures within the area. The revised proposal further reduces the intensity of the use by lowering the number of bedrooms, thereby diminishing any potential impact on parking demand. Coupled with the site's sustainable location and accessibility to services and public transport, it is considered that the proposal would not materially exacerbate on-street parking conditions or give rise to highway safety concerns. The development is therefore consistent with LDP Policies GP2, GP4, T4 and H8, alongside the Parking Standards SPG.
- 7.4 Overall, the proposal has overcome the deficiencies identified in the previous decision and represents an appropriate and policy compliant form of development. Accordingly, it is respectfully requested that planning permission be granted.