

HMO Objection - 51 Tennyson Road

Application Reference: 26/0456

For the attention of Vicky Quinn, Planning Officer
Newport City Council

Formal Objection to Proposed HMO Conversion

51 Tennyson Road, Newport

We are writing to strongly object to the proposal to convert a 3-bedroom family home into a 6-bedroom, 7-person House in Multiple Occupation.

We did not object to the original application as it proposed conversion to a single-family home, which we would have welcomed given that the street is composed solely of single-household families. The revised plans represent an entirely different proposition that is incompatible with the established residential character of the area.

We also wish to highlight that the same applicant previously obtained planning permission for an extension to this property, explicitly stating its intended use as a playroom. The current application represents a fundamentally different scheme to what was presented to neighbours. We feel misled by the original application and question whether the earlier permission was sought in bad faith to establish the footprint now being repurposed for HMO use.

1. Residential Amenity: Noise and Disturbance

The party wall between our property (No. 49) and 51 Tennyson Road provides negligible sound insulation. With the previous single-family occupants, noise transference was already such that conversations could be heard clearly through the shared wall.

The proposed layout places the communal lounge and communal living area directly against the party wall shared with our children's bedroom (ages 6 and 8). This arrangement would cause unacceptable noise nuisance, particularly at night, due to:

- Six independent households generating constant movement, door slamming (multiple fire doors), and varied activity patterns throughout the day and night
- Increased comings and goings including deliveries (takeaway, parcels), visitors, and potential shift workers arriving and departing at unsociable hours
- The communal garden French doors located directly below our children's bedroom window
- The rear garden terrace elevated to a level that overlooks our children's bedroom, carrying sound directly upward and into their room

Our children sleep with their bedroom window open due to health issues (asthma), which is necessary for ventilation and to reduce damp and mould in this older property. If residents congregate or smoke in the communal garden, smoke and noise will travel directly into their bedroom.

The impact on our children's sleep, health, and wellbeing would be significant. Their privacy would also be compromised by the elevated terrace providing a direct sightline into their room.

We also work from home, and the intensified use of the property would cause ongoing disruption to our ability to carry out our work and enjoy our home.

Newport HMO SPG states that councils must assess the impact of intensified use on the residential amenity of adjoining occupiers, with particular attention to the relationship between proposed communal areas and neighbours' sensitive rooms.

2. Parking and Highway Safety

Tennyson Road is a quiet residential street that is already saturated with parked cars, particularly during evenings and weekends. On-street parking is the only option for most residents and finding a space is already a daily struggle.

There are at least 4 blue badge holders within close proximity (Nos. 52, 45, and 44 Tennyson Road), some of whom were refused dedicated disabled bays by NCC. These residents cannot walk up hills or park far from their homes. Additional residents on Milton Road and Coleridge Road also rely on nearby spaces.

Beechwood Park has no car park, which generates significant additional parking pressure on surrounding streets as dog walkers and park users compete for spaces.

Concerns regarding the parking survey submitted with the application:

The survey was conducted at 5:30 am. The street has a high proportion of medical professionals working shifts whose vehicles would not have been present at that time. This does not reflect actual parking demand. We have photographic evidence taken at various times over 7 days demonstrating how saturated the street already is.

The survey has also failed to account for all dropped kerbs, and the recent installation of electric vehicle charging points further along Tennyson Road has removed additional on-street spaces.

Highway safety:

Vehicles already park illegally on the junction with Coleridge Road, creating a visibility hazard for pedestrians and drivers on what is a dangerous bend. Highway Code Rule 243 states that drivers must not stop or park opposite or within 10 metres of a junction, or on a bend. The addition of up to 7 further vehicles (or more, with visitors) will intensify this existing hazard.

Supporting evidence: Photographs of parking saturation at various times over 7 days to be appended.

3. Inadequate Waste and Recycling Provision

As an HMO with a single Council Tax account, the property would be treated as one household for waste collection purposes. The bin provision would be limited to:

- 1 x 240-litre general waste bin
- 1 x Red Recycling Bag
- 1 x Blue Recycling Bag
- 1 x Glass Recycling Box
- 1 x Food Waste Caddy

This provision is wholly inadequate for 7 individuals from 6 separate households. Based on NCC's allocation of approximately 30 litres of residual waste per person per week, 7 occupants would generate 210 litres, leaving almost no capacity margin and no allowance for irregular waste.

The inevitable result will be overflowing bins, waste accumulation, vermin, and odour. We take pride in our front garden and the street scene, and this would directly degrade both.

The property also lacks a discrete rear or side storage area for multiple bins, meaning waste would be visible from the street.

4. Substandard Living Accommodation

The property is compact even with the proposed two-storey extension. We question whether it can adequately house 7 individuals to an acceptable standard:

- Bedroom sizes appear to be very close to NCC minimum standards. Have the en-suite areas been deducted from the stated floor areas? This is not indicated on the plans.
- The chimney breast reduces usable floor space in at least one bedroom.
- The double loft room has a sloping ceiling; floor area beneath a sloping ceiling below the required head height cannot be counted as usable living space under Welsh housing standards.
- Communal space appears cramped for 7 occupants.

The communal kitchen is inadequate for 7 occupants from 6 independent households. It does not appear large enough for two people to cook simultaneously, yet all residents will need to prepare meals during peak usage times (mornings, lunchtimes, and evenings). This will inevitably lead to conflict, unsafe overcrowding of the kitchen, or residents resorting to cooking in bedrooms.

The communal lounge is similarly undersized for 7 people. Combined with the cramped kitchen, there is simply insufficient shared space for this number of occupants to live with any reasonable quality of life.

This is not a sustainable or dignified response to Newport's housing needs.

5. Structural Integrity and Party Wall

We will not consent to the removal or alteration of the shared chimney breast, which forms part of the structural party wall between Nos. 49 and 51. Any interference with this structure risks compromising the structural integrity of our property. Furthermore, we are actively considering the installation of a log burner due to rising gas costs, which requires the chimney breast and flue to remain intact and functional.

6. Fire Safety

The plans do not clearly demonstrate how 7 occupants would safely evacuate in the event of a fire:

- What are the designated escape routes from upper floors?
- The rear garden is small, further reduced by the two-storey extension, leaving a narrow escape route.
- Seven households cooking independently substantially increases fire risk, both for the occupants and for our adjoining property.

We have serious concerns about fire potentially spreading to our property through the shared party wall.

7. Green Infrastructure and Protected Wildlife

Our garden and the boundary between Nos. 49 and 51 Tennyson Road is an active corridor for bats, which are present due to the close proximity to Beechwood Park. We have observed significantly increased bat activity this year compared to previous years, and we believe they roost in cracks and crevices of both our property and No. 51.

Bats are strictly protected under:

- **The Conservation of Habitats and Species Regulations 2017** (as amended): It is an absolute offence to deliberately capture, injure, or kill a bat, or to damage or destroy a roost.
- **Wildlife and Countryside Act 1981** (as amended): It is illegal to intentionally or recklessly disturb a bat while occupying a shelter, or to obstruct access to a roost.

The proposed building works and altered design would disrupt established flight paths and potentially destroy roost sites. We do not believe an adequate ecological survey has been conducted.

Given the evidence of bat activity, we formally request that the planning authority requires a full bat survey (including dusk emergence and dawn re-entry surveys conducted during the active season) before this application is determined. Natural Resources Wales guidance is clear that where there is a reasonable likelihood of bats being present, determination without adequate survey data would be unlawful.

We have also observed hedgehogs nesting annually in the overgrown garden at No. 51. While the garden's current state is unsightly, it provides habitat for this endangered species.

Supporting evidence: Photographs and video of bat activity to be appended.

8. Failure to Meet Green Infrastructure Requirements

The application fails to meet the mandatory Green Infrastructure requirements set out in Planning Policy Wales (Edition 12). All planning applications in Wales must include a GI Statement demonstrating how the stepwise mitigation hierarchy has been applied: avoid harm, minimise impacts, mitigate or restore on-site, and compensate for residual impacts.

The proposed scheme significantly increases hard surfacing and concrete coverage, reduces existing green space, and provides very minimal indication of compensatory measures. The inclusion of a single bird box and two non-native ornamental plants (Hellebores and Liriope muscari) does not constitute meaningful biodiversity net benefit. There is no provision for sustainable drainage (SuDS), green roofs, native hedgerow planting, bat boxes, or any other substantive ecological enhancement.

The application should not be approved until a compliant GI Statement is submitted demonstrating genuine net benefit for biodiversity, not simply a tick-box exercise.

9. Character of the Area and Over-Concentration

Tennyson Road is a safe, quiet, tight-knit community of single-household families. An HMO does not align with the established residential character.

Newport already has over 360 HMOs and rising. Several have been subject to closure orders due to significant anti-social behaviour. Recent local cases illustrate these risks: in July 2026 alone, a Newport house was boarded up under a closure order following persistent anti-social behaviour and disorder reported by residents (<https://www.gwent.police.uk/news/gwent/news/news/2026/july/newport-house-boarded-up-after-reports-of-anti-social-behaviour/>), while a separate incident on St Edward Street saw armed police called after a man was spotted with a crossbow following reports of threatening behaviour at an address (<https://www.bbc.co.uk/news/articles/cg74xpemg1eo>). The nearby park is already experiencing issues related to the TA centre on Chepstow Road, with multiple police attendances. An HMO in this location risks adding to existing pressures on Gwent Police resources.

10. Personal Safety (Confidential Concerns)

We have serious and specific concerns regarding the personal safety of our family in relation to this application. Due to the sensitive nature of these concerns, we do not consider it appropriate to detail them in a public objection.

We respectfully request the opportunity to discuss this matter confidentially with the case officer. We are confident that once the details are understood, they will be considered a material factor in the determination of this application.

Summary of Grounds for Refusal

1. Unacceptable harm to residential amenity, particularly to adjoining children's bedrooms
2. Misleading application history, with the extension footprint now repurposed for HMO use
3. Inadequate parking provision on an already saturated street, with a flawed parking survey
4. Insufficient waste storage for 7 occupants
5. Substandard room sizes, kitchen, and communal living conditions for future occupants
6. No consent for party wall/chimney breast alteration, with structural integrity concerns
7. Unresolved fire safety concerns for occupants and neighbours
8. Potential harm to legally protected bat species without adequate ecological assessment; full bat survey requested
9. Failure to meet mandatory Welsh Green Infrastructure requirements
10. Incompatibility with the established residential character of the street

Supporting photographs and evidence to follow.

Yours sincerely,

The Occupants

49 Tennyson Road, Newport

Appendix: Supporting Evidence

The following evidence is attached to this objection:

- 19 date and time-stamped photographs demonstrating parking saturation on Tennyson Road at various times over 7 days
- 2 screenshots from video footage evidencing the presence of bats at the boundary between Nos. 49 and 51 Tennyson Road