



DESIGN AND ACCESS STATEMENT

Change of Use from Class F1 to Class C4 Five-Person HMO

Site: St Mary Street Sunday School, St Mary Street, Newport, NP20 4DG

Prepared by: Architect Designs, Company No. 15900040

Application: Change of use from former Sunday School to five-person HMO

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1. Introduction

This Design and Access Statement supports a full planning application for the change of use of the former Sunday School building from Use Class F1 to a small House in Multiple Occupation within Use Class C4 for up to five residents.

The revised proposal has been prepared following the Council's pre-application response and includes:

- five bedrooms;
- a communal living and dining room;
- shared kitchen and sanitary facilities;
- secure storage for five bicycles;
- refuse storage within the rear garden;
- shared access to the rear garden; and
- retention and enhancement of the existing green infrastructure.

The proposal represents the sustainable reuse of an existing building within the Newport urban area.



2. Site Description and Context

The site comprises the former St Mary Street Sunday School, positioned directly adjacent to the pavement with no front curtilage.

The surrounding area contains a mixture of residential, community and institutional uses. The adjoining boxing club remains in use and is separate from the application building.

The property benefits from an enclosed rear garden, accessed through the basement, which will provide communal outdoor amenity space for all residents.

The site has no off-street parking.

3. Description of the Proposed Development

The proposal seeks permission for a five-person HMO comprising:

- five single-occupancy bedrooms;
- a communal living and dining room;
- shared kitchen facilities;
- individual bathroom and sanitary facilities;
- secure bicycle storage for five bicycles; and
- shared access to the rear garden.

All bedrooms and communal rooms are designed to meet the applicable space and HMO amenity standards.

The proposal is contained principally within the existing building and does not materially increase its scale or footprint.

4. Residential Accommodation and Amenity

The revised layout provides a dedicated communal living and dining room for the use of all five residents. This addresses the concern raised at pre-application stage regarding the absence of sufficient communal living accommodation.

The living and dining room will provide suitable space for seating and dining, allowing residents to socialise and relax away from their bedrooms.

All residents will have access to the rear garden through the communal parts of the building.



The scale of occupation is modest and will remain domestic in character. The proposed use is not considered likely to result in unacceptable noise, disturbance or overlooking.

5. Basement Bedroom

The basement opens directly onto the rear garden and is served by rear-facing windows.

The basement bedroom benefits from natural light, ventilation and a direct external outlook. The relationship with the garden means that the room is not dependent upon an enclosed lightwell.

The submitted drawings and sections will demonstrate the relationship between the basement floor level, rear windows and garden.

The basement accommodation is therefore considered suitable for residential use. The submitted application includes photos of the rear of the building, showing direct access to the garden.

6. Relationship with the Adjoining Boxing Club

The boxing club windows facing the rear garden are obscure glazed and non-opening.

These windows do not permit direct views into the garden and will not result in an unacceptable loss of privacy for residents.

The existing garden boundaries will also be retained, providing further enclosure and screening.

The proposal will not alter or restrict the continued operation of the adjoining boxing club.

7. Highways, Parking and Cycle Storage

No off-street parking is available or proposed.

The Council's pre-application response confirmed that the former Sunday School use had a materially greater parking requirement than the proposed residential use. The Council calculated that the existing use could generate demand for approximately 19.5 spaces plus one commercial space, whereas the earlier residential proposal generated demand for six spaces. The five-person HMO now proposed would be no more intensive than the scheme assessed at pre-application stage.



The Council concluded that the absence of dedicated parking was acceptable because of:

- the sustainable location;
- existing on-street parking controls;
- the reduced parking demand compared with the former use; and
- national policy support for reducing private-car dependency.

Secure storage will be provided for five bicycles. The store will incorporate Sheffield stands within a store area in the building, responding directly to the advice of the Council's Highways Officer.

8. Refuse and Recycling

Refuse and recycling bins will be stored outside the rear door on a timber platform within the rear garden.

On collection days, the bins will be moved a short distance through the ground floor from the rear to the front of the property. They will be returned to the designated storage area promptly following collection.

The property-management arrangements will ensure that:

- bins are presented only on collection days;
- bins do not obstruct the pavement;
- containers are returned promptly;
- waste is separated correctly; and
- the rear storage area is maintained.

This arrangement avoids permanent bin storage at the street frontage.

9. HMO Concentration

The site lies within an area where Newport City Council applies a 15 per cent HMO threshold within a 50-metre radius.

The Council's pre-application assessment identified one existing HMO within the relevant radius. Including the proposed development, the resulting concentration would be approximately 6.25 per cent.



The proposal would therefore remain well below the Council's 15 per cent threshold and would not result in an unacceptable concentration of HMOs.

10. Loss of the Former Community Use

Policy CF12 of the Newport Local Development Plan protects community facilities unless alternative provision of at least equal benefit is available or the existing facility is surplus to community requirements. The Council identified this as a key matter requiring evidence within any future application.

The application site comprises the former St Mary's Sunday School, which historically operated as an ancillary facility serving St Mary's Church. The Sunday School is no longer capable of fulfilling this function as it has been legally separated from the church on an independent freehold title and the church itself ceased operating many years ago and now facilitates a boxing club.

Since its closure, the building has remained vacant and no longer provides a community service. Furthermore, the property has been placed on the open market through public auction following its separation from the church title, demonstrating that it is no longer required for its former ecclesiastical purpose.

The proposal would therefore not result in the loss of an active or viable community facility, as the use has already ceased.

In addition, there is a broad range of alternative community facilities within the surrounding area capable of accommodating community meetings, social activities and events. These include The Share Centre, Stow Park Community Centre, Pill Millennium Centre, Shaftesbury Community Centre, Ridgeway Community Centre and Maesglas Community Centre, all of which provide alternative venues for community activities.

Consequently, the proposal would not lead to a harmful reduction in the availability of community facilities within the locality. Rather, it would secure the beneficial reuse of a long-vacant building that has become detached from its original purpose and has no realistic prospect of resuming its former use.

11. Green Infrastructure Statement

The principal green infrastructure feature within the site is the existing rear garden.



The garden will be retained as shared amenity space and will not be converted into parking or substantially built over.

The proposal will include proportionate improvements comprising:

- native or wildlife-friendly planting;
- pollinator-friendly species;
- Introduction of garden surfaces;
- a bird-nesting box;
- an insect habitat feature.

The timber refuse platform will occupy only a limited area close to the rear door and will not prevent the remainder of the garden from functioning as usable amenity space.

These measures follow the stepwise approach by retaining the existing garden, minimising habitat disturbance and providing appropriate on-site enhancements, as requested within the Council's pre-application response.

12. Design and Appearance

The proposal principally involves a change of use and internal reconfiguration.

No harmful alterations are proposed to the principal elevation. The established scale and appearance of the building will therefore remain unchanged.

Any works to the rear will have limited public visibility and will not harm the character or appearance of the surrounding area.

13. Planning Policy

The proposal has been considered against:

- Future Wales: The National Plan 2040;
- Planning Policy Wales, Edition 12;
- the Newport Local Development Plan 2011–2026;
- Policy SP1: Sustainability;
- Policy SP12: Community Facilities;
- Policy GP2: General Amenity;
- Policy GP4: Highways and Accessibility;
- Policy GP5: Natural Environment;

- Policy GP6: Quality of Design;
- Policy H8: Self-Contained Accommodation and Houses in Multiple Occupation;
- Policy T4: Parking;
- Policy CF12: Protection of Existing Community Facilities; and
- Policy W3: Provision for Waste Management Facilities in Development.

The Council confirmed at pre-application stage that the principle of residential development is acceptable because the site is within the settlement boundary and an existing residential area.

The revised proposal addresses the principal concerns raised by providing:

- a communal living and dining room;
- a single five-person HMO rather than a separate basement flat;
- improved garden access and amenity;
- secure Sheffield-stand cycle storage;
- managed refuse arrangements;
- evidence supporting the loss of the community use; and
- a proportionate Green Infrastructure Statement.

14. Conclusion

The proposed change of use from the former Sunday School to a five-person HMO represents an appropriate and sustainable reuse of the building.

The proposal:

- provides five bedrooms meeting the relevant standards;
- includes a communal living and dining room;
- provides access to the rear garden for all residents;
- provides suitable light and outlook to the basement bedroom;
- protects privacy in relation to the adjoining boxing club;
- includes secure storage for five bicycles;
- provides a managed refuse arrangement;
- generates less parking demand than the former use;
- remains below the Council's HMO concentration threshold;
- retains and enhances the rear garden; and
- is supported by evidence explaining the loss of the former community use.

The revised development directly responds to the matters identified during the pre-application process and should be granted planning permission.



References

Newport City Council (2015) *Newport Local Development Plan 2011–2026*. Newport: Newport City Council.

Newport City Council (2026) *Pre-application Planning Advice: St Mary Street Sunday School, Newport, Reference PS/26/0026*. Newport: Newport City Council.

Welsh Government (2021) *Future Wales: The National Plan 2040*. Cardiff: Welsh Government.

Welsh Government (2024) *Planning Policy Wales. Edition 12*. Cardiff: Welsh Government.