

PLANNING STATEMENT

Change of use of from single dwelling to a six-bedroom House in Multiple Occupation

3 Clytha Crescent, Pillgwenlly, Newport, NP20 2EY

1. Introduction

This Planning Statement has been prepared in support of a revised planning application for the change of use of 3 Clytha Crescent, Newport from a single dwelling (Use Class C3) to a six-bedroom House in Multiple Occupation (Sui Generis).

The application follows the refusal of planning application 25/0364 and the subsequent dismissal of appeal reference CAS-04572-Z7V2B7.

The revised submission has been prepared having careful regard to the comments made by Newport City Council, the statutory consultees and the Inspector's appeal decision. The proposal has been amended where appropriate, and additional technical information has been provided to directly address the matters that previously resulted in refusal.

In particular, the revised application includes:

- A revised front roof design incorporating two conservation rooflights in place of the previously proposed four rooflights;
- Conservation specification flush-fitting rooflights aligned with the existing fenestration;
- Detailed cycle storage proposals in accordance with the Highway Authority's recommendations;
- Improved refuse and recycling storage arrangements;
- An updated Flood Consequences Assessment incorporating the additional flood modelling information requested by Natural Resources Wales.

It is considered that these amendments satisfactorily address the previous concerns whilst retaining the significant benefits of providing high quality shared accommodation in an exceptionally sustainable location.

2. Site and Proposal

The application site comprises an existing four-storey terraced property (including the converted loft) within the Clytha Conservation Area. The property occupies a highly sustainable location immediately adjacent to Newport Central Police Station and within a short walking distance of the Royal Gwent Hospital, Commercial Road District Centre and Newport City Centre.

Planning permission is sought for the conversion of the existing dwelling into a six-bedroom HMO. The proposal provides six bedrooms together with communal kitchen, dining and living accommodation, secure internal cycle storage, internal refuse and recycling storage and associated internal alterations. Externally, alterations are limited to the installation of two conservation rooflights to the front roof slope together with integrated bat and swift boxes.

The proposal makes efficient use of an existing building without extending its footprint or materially altering its external appearance.

3. Previous Refusal and Appeal

The previous application was refused for three principal reasons:

1. HMO concentration;
2. Flood Risk;
3. Rooflights within the Conservation Area.

This revised application has been specifically prepared to address each of these matters.

4. Conservation Area

The Inspector concluded that the principal concern related not to the principle of rooflights, but to their number and arrangement.

Importantly, the Inspector noted that the revised rooflight design submitted during the appeal process could not be taken into account because it constituted a material amendment to the proposal rather than because it was unacceptable in planning terms.

The current application therefore incorporates those revisions.

The number of rooflights has been reduced from four to two. They have been repositioned to align with the existing first-floor windows and will be flush-fitting conservation rooflights with dark matt surrounds in accordance with the recommendations of the Council's Heritage Officer.

The revised design directly responds to the Heritage Officer's previous comments and is considered to preserve the character and appearance of the Clytha Conservation Area in accordance with Policy CE7.

5. Flood Risk

The previous application was refused because the submitted Flood Consequences Assessment did not contain the additional site-specific modelling requested by Natural Resources Wales.

It is important to note that NRW did not object to the principle of the development. Rather, they requested additional technical information before they were able to complete their assessment.

That information has now been obtained and is included within the new Flood Consequences Assessment submitted with this application.

This more detailed assessment confirms that the street-level floor containing the proposed bedrooms remains above the predicted flood level. Only the ground floor, which accommodates communal kitchen, dining and living room, lies within the mapped flood extent.

Accordingly, no sleeping accommodation is located within the area at risk of flooding.

The updated assessment also confirms that safe refuge and safe means of escape remain available throughout the design flood event and concludes that the proposal satisfies the requirements of TAN15 and Policy SP3.

The proposal does not increase the building footprint, displace flood water or introduce a new residential use to the site, which already benefits from lawful residential use.

6. HMO Concentration

The proposal continues to result in a minor exceedance of the 15% threshold identified within the Council's Houses in Multiple Occupation Supplementary Planning Guidance. However, the Inspector's decision provides clear guidance on the weight that should be afforded to this matter.

Whilst acknowledging that the proposal would exceed the numerical threshold by a single percentage point, the Inspector concluded that this represented only a minor infringement of the SPG and noted that the guidance is intended to support the application of Policy H8 rather than operate as an absolute limit. The Inspector further recognised that the appeal site occupies a unique mixed-use location where the presence of the Royal Gwent Hospital, Newport Central Police Station and other non-residential uses naturally limits the number of dwellings within the 50 metre assessment radius. These local circumstances differ significantly from the predominantly residential examples used within the SPG.

Importantly, the Inspector concluded that increasing the number of HMOs from one to two within this mixed-use environment would have little discernible effect on the character of the area. Significant weight was also attached to the comments of the Designing Out Crime Officer, who raised no objection to the proposal and confirmed that there were no crime trends associated with the existing HMO in the locality. Accordingly, the Inspector was satisfied that the proposal would not adversely affect social cohesion.

The Inspector ultimately concluded:

"I therefore conclude that the proposal would accord with the objectives of LDP Policies GP2 and H8 which seek to avoid adverse impacts on social cohesion, the character of the locality and general amenity."

As no changes are proposed to the nature or scale of the HMO itself, these conclusions remain directly applicable to the current application. The revised submission therefore fully addresses the previous concerns relating to HMO concentration, with the only substantive amendments to the scheme relating to flood risk information, cycle storage, refuse storage and the appearance of the rooflights.

7. Other Matters

The revised drawings now include detailed cycle storage arrangements in accordance with the recommendations of the Highway Authority, incorporating secure purpose-designed cycle racks capable of accommodating six bicycles.

Similarly, refuse and recycling storage has been redesigned to provide dedicated ventilated storage sized in accordance with the Council's waste requirements.

These amendments directly address matters previously identified by consultees and demonstrate the applicant's commitment to delivering a high-quality development.

8. Conclusion

This revised application has been prepared following careful consideration of the previous refusal and subsequent appeal decision.

The proposal has evolved to address each of the previous concerns through amended drawings and additional technical information.

The revised rooflight arrangement reflects the recommendations of the Heritage Officer and preserves the character and appearance of the Conservation Area.

The updated Flood Consequences Assessment provides the additional modelling information previously requested by Natural Resources Wales and demonstrates that flood risks can be safely managed in accordance with TAN15 and Policy SP3.

Detailed cycle and refuse storage arrangements have been incorporated in response to the Highway Authority's comments, while the proposal continues to provide high-quality shared accommodation in one of Newport's most sustainable locations.

The proposal therefore accords with the objectives of Planning Policy Wales together with Policies SP1, SP3, GP2, GP4, GP6, H8 and CE7 of the Newport Local Development Plan, and it is respectfully requested that planning permission be granted.