

**TOWN AND COUNTRY PLANNING ACT 1990
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**

**CONVERSION OF CHURCH
TO 9 NO. FLATS AT ST
PAUL'S CHURCH
COMMERCIAL STREET
NEWPORT NP20 4EJ**

**DESIGN AND ACCESS STATEMENT
ACCESS STATEMENT**



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1.0 INTRODUCTION

- 1.1 This Design and Access Statement has been prepared to supplement the submission of applications for Planning Permission and Listed Building Consent for the conversion of St Paul's Church, Commercial Street, Newport into 9 flats.
- 1.2 This statement will describe the location of the site and the appearance of the building before setting out what is proposed in the applications. A brief reference will be made to the planning history before setting out the planning policy context, making particular reference to Newport Local Development Plan 2011-2026.
- 1.3 The design concepts will then be addressed with regard to matters contained within a Design and Access Statement before concluding with the opinion that the proposal will policy compliant, would make beneficial use of a heritage asset and enable its long-term protection, without affecting its setting.
- 1.4 Further assessment is of course also provided in the following supporting documents submitted with this application:
- Structural Appraisal of Existing Roof Structure, Mann Williams Consulting Civil Engineering
 - Heritage Statement, Planning Heritage
 - Bat and Nesting Bird Survey, Acer Ecology

2.0 LOCATION AND DESCRIPTION OF THE APPLICATION SITE

- 2.1 St Paul's Church is located on the west side of Commercial Street, towards its southern end, southeast of its junction with Palmyra Place. The church spire is located at the eastern end of the building, with steps running downwards to Commercial Street.
- 2.2 The church is constructed of course stone with ashlar dressings and has a slate roof. There is an octagonal tower and spire at its eastern end with an open porch with tall arches.
- 2.3 St Paul's Church was closed for worship in 1991 and the first-floor balcony area to the rear of the church has been used as a drug misuse drop-in centre.

- 2.4 Enclosed with this application is a structural report of the roof from 2015 prepared by Mann Williams Civil Engineering. This report states that the Church comprises a masonry building with a timber truss framed roof. The building was constructed in 1835 and is grade II listed. The main roof is formed by timber trusses spanning between the side walls. The trusses span approx. 17m clear between the walls.
- 2.5 Interestingly, the report also mentions that within the main hall space a new partition wall has been built from the 1st floor to underside of ceiling to separate the spaces. This wall has been made to look like the edge of the previously constructed balcony however it does not line up with the recorded line of the historic balcony. It is understood that the main hall once had a pitched ceiling, in line with the common rafters. The flat ceiling at eaves level along with subsequent timber panelling detail and ornate plaster work is reported to have been added at a later date.

3.0 RELEVANT PLANNING HISTORY

- 3.1 An application has previously been made to convert this building to residential flats. This was submitted under reference 21/1272 for Listed Building Consent for conversion of church to 20 no. Flats (comprising 16 no. 1 bed and 4 no. 2 bed flats) including construction of dormer. Listed Building Consent was refused on 17th February 2022 for the following reasons:
- 1. The proposed development is without proper understanding of the significance of the building and its impact on the historic asset, it is also without justification, assessment of alternatives and evidence that the proposed use is the best and least harmful use of the building. It fails to demonstrate that special regard has been given to preserving the special historic interests of the building. This is contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990, Planning Policy Wales (Edition 11), TAN 24 and policy SP9 of the Newport Local Development Plan 2011-2026 (adopted January 2015).*
 - 2. The likely impacts on a European Protected Species (bats) has not been demonstrated through appropriate survey work and in absence of this information it cannot be determined that the proposals will not result in a harmful impact to the maintenance of their favourable conservation. This is contrary to Technical Advice Note 5 "Nature Conservation and Planning" and policies SP9 and GP5 of the Newport Local Development Plan 2011-2026 (adopted January 2015).*

3.2 The purpose of this revised application is to demonstrate how the above concerns have been considered and addressed.

4.0 THE APPLICATION PROPOSALS

4.1 This application proposes the conversion of the church into 9 flats, comprising 6 No. 2-bed and 3 No. 3-bed units. The sub-division of the internal space seeks to keep the chancel area at the eastern end of the building open, this then leading to a wide space running to the western part of the church with the flats accessed off this central walkway, except for units 1, 8 and 9 which will gain access from a separate entrance from the west of the building where there will be a staircase.

4.2 Externally the previously proposed ribbon dormer window has now been removed and the number of units has now been reduced to 9 flats. This is considered to represent a more sympathetic and a less intensified change of use. Parking will be provided for 10 cars to the south and southwest of the church in the location shown on the accompanying block plan. These will be accessed from the service road off Commercial Street to the southeast of the church.

5.0 PLANNING POLICY CONTEXT

The Development Plan

5.1 As mentioned in the introduction, the Newport Local Development Plan 2011-2026 (NLDP) is the relevant development plan for this application and was adopted in January 2015. The relevant policies are considered to be as follows:

- SP1 Sustainability
- SP9 Conservation of the Natural, Historic and Built Environment
- SP10 House Building Requirement
- SP12 Community Facilities
- SP14 Transport Proposals
- SP15 Integrated Transport
- SP18 Urban Regeneration

6.0 PRINCIPLE OF THE DEVELOPMENT

- 6.1 The application site is located within a settlement boundary as designated by the maps contained within the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). Therefore, the principle of development is acceptable in accordance with Policy SP1.
- 6.2 Additionally, Policy SP18 concerns urban regeneration and says that proposals will be favoured which assist the regeneration of the urban area, particularly where they contribute to the vitality, viability, and quality of the environment of the city centre; the provision of residential and business opportunities within the urban area; and reuse vacant, underused or derelict land. Accordingly, it is considered that the proposed conversion of St Paul's Church represents the opportunity for urban regeneration, making effective use of a disused building within a sustainable location. As confirmed by the aerial photograph below, the site lies within the city centre of Newport and comprises previously developed land.



- 6.3 As part of the previous application which was refused in 2022 an issue raised by consultees and within the reason for refusal was that no other more suitable alternative uses had been considered before a residential use. In response to this, whilst it is accepted that a place of worship represents a community facility, it is not a requirement under existing Local Plan policies to carry out a period of marketing for similar uses before seeking a residential change of use. Church services ceased in 1991, and there was no attempt to

bring the building back into use in the following decades, which has then inevitably precipitated its sale in 2018.

- 6.4 The other reason why an alternative community use would not be feasible is purely practical. The existing building in its current condition is not considered to be fit for purpose for public use for health and safety reasons. The roof requires repairing, weather proofing and the interior is in serious need of refurbishment. It would require a significant financial outlay to make the building accessible and safe as a community facility which would not be a viable proposition on top of its existing market value.

7.0 DESIGN CONSIDERATIONS

Internal

- 7.1 The internal space of the building comprises a large main hall where scaffold has been constructed to support the roof structure. The size of this internal space and the height of the ceiling with its ornate timber cross beams provides an opportunity for conversion but is important to retain the character of this large space and high ceiling. The other important characteristic of the internal space is the large stained-glass windows that let in so much light on either side of the building.



- 7.2 The photographs above show the high ceilings and large stained-glass windows within the main hall which define the character of the internal space. Clearly, the subdivision of this internal space to separate flats will change this character however, the intended approach is to do this in the most sympathetic and respectful way possible.

- 7.3 It is acknowledged that the previous application did not give a great deal of forethought into how to use this internal space, however this revised application for nine flats follows a more considered approach. Firstly, the number of units has been reduced from 20 down to 9 flats. This will be larger two- and three-bedroom apartments, and this means there is less new partition walling. This also means that there will no longer be a separate first floor. What is now proposed are split level flats each with their own staircase meaning that each flat dweller gets to experience the full height of the building and benefit of the light entering the windows.
- 7.4 The stained-glass windowpanes on the side elevations of the building (the south east and north west elevations) will be photographically recorded and removed. This will be replaced with new clear coloured glass panes, but these will enable more light to enter the new living spaces compared with the existing stained glass and will provide the new residents with an outlook. The stained-glass windows on the south west and northeast elevations will remain as original. The reason for the replacement of the stained glass panes on the side is that at present the original stained glass lets in a limited amount of light and are entirely opaque, which will mean the new flat dwellers would have no view at into the outside world.



As shown by the photograph on the previous page, the large stained glass windows allow light into the building are entirely opaque providing no visibility out. This would not be acceptable for residential apartments and providing secondary glazing would not solve this problem.

External

- 7.5 The external fabric and stonework of the building will be cleaned and refurbished to bring it up to habitable standards. One of the main issues that was raised as part of the previous application was the installation of a large ribbon dormer window on the roof to provide space for apartments in the second floor. However, for this revised application, whilst one flat is still proposed in the second floor of the building, the ribbon dormer window has been removed and replaced with rooflights. These will be flush with the plane of the roof.

8.0 ACCESS AND MOVEMENT

- 8.1 This revised application now seeks to make the building more accessible and easier to use than the previous scheme. Previously all flat dwellers would have had to access the building from the main entrance from the east and use the central walkway to access apartments on the ground floor and those living on the first and second floors would have had to walk to the west end of the building to use the staircase. Now flats 1, 2, 3, 4, 5, 6 and 7 are split level and will have their own private staircases. Additionally, flats 1, 8 and 0 can now be accessed from a new eastern entrance on the ground floor. This makes the building more accessible and easier to use.

- 8.2 Whilst the development will provide 10 no. car parking spaces, walking and cycling will be encouraged wherever possible and a secure bike store will be provided within the grounds of the building. Similarly, a storage area of refuse and recycling containers will also be provided.

9.0 BIODIVERSITY

- 9.1 As part of the previous application, one of the reasons for refusal was due to the likely impacts on a European Protected Species (bats) has not been demonstrated through appropriate survey work and in absence of this information it cannot be determined that the proposals will not result in a

harmful impact to the maintenance of their favourable conservation. In response to this issue, an updated bat and nesting bird survey has now been carried out and the findings are presented in a report which is enclosed with this application. This concludes that the survey found no evidence of bats roosting within or on the external parts of the church and no evidence of past or current nesting by birds was observed during the survey.

10.0 CONCLUSIONS & PLANNING BALANCE

- 10.1 In summary, this application is made to address the reasons for refusal of the previous application made in 2022 for 20 flats. It is accepted that this previous scheme was an over-intensive proposal, particularly in terms of the internal layout and use of space. This new application now reduces the number of flats down to 9 units and this has enabled a far more spacious layout internally. The flats will now be dual level, maximising the building's high ceiling and large windows.
- 10.2 At the same time, the previous ribbon dormer window has been removed and replaced with rooflights to serve a single flat on the second floor. These rooflights will be flush with the existing roof plane. The application is now supported by a Heritage Statement which also identifies the advantages of this residential redevelopment scheme. Overall, it is considered that compared with the current 'status-quo' this application offers an opportunity for the building to be restored, repaired and refurbished, and that is a much better prospect compared to it remaining derelict.