



LRJ PLANNING

Planning, Design and Development

PLANNING, DESIGN AND ACCESS STATEMENT

APPLICATION FOR PLANNING PERMISSION AND LISTED BUILDING CONSENT

**CHANGE OF USE, CONVERSION, REFURBISHMENT AND
ALTERATIONS OF TREDEGAR CHAMBERS TO CREATE A MIXED
USE SCHEME COMPRISING 15 APARTMENTS AND 5 RETAIL UNITS
(A1/A2 USE)**

**TREDEGAR CHAMBERS, 76-81 BRIDGE STREET, NEWPORT, NP20
4AQ**

SEPTEMBER 2024



1.0 Introduction

- 1.1 This Statement has been prepared by LRJ Planning Ltd to accompany the full planning application and application for listed building consent for the change of use, conversion, refurbishment and alterations of Tredegar Chambers to create a mixed use scheme comprising 15 apartments and 5 retail units.
- 1.2 This Statement provides a planning analysis to demonstrate that the submitted proposal is acceptable in planning terms and in accordance with the relevant policy and guidance.
- 1.3 Both applications are supported by a site layout plan, floor plans and full elevational plans, as well as supporting technical documents, which illustrate that the site is capable of accommodating the development and its associated works.
- 1.4 The remainder of this Statement is structured as follows:
- Section 2: Site Location and Description
 - Section 3: Background
 - Section 4: Development Proposal
 - Section 5: Planning Policy Context
 - Section 6: Planning Analysis
 - **A) The principle of development**
 - **B) Impact on the character and appearance of the Grade II Listed Building and Conservation Area**
 - **C) Impact on residential amenity**
 - **D) Level of amenity for future occupants**
 - **E) Access and Parking**
 - **F) Biodiversity**
 - Section 7: Design and Access Statement
 - Section 8: Conclusion



2.0 Site Location and Description

2.1 The application site consists of Tredegar Chambers, a Grade II listed, four-storey former office building dating from around 1900. It features shopfronts on the ground floor and occupies a prominent corner position where Bridge Street meets Cambrian Road, within the Newport City Centre Conservation Area.

2.2 The building plays a significant role in the views at the junction of High Street, Bridge Street, Skinner Street, and Stow Hill to the east, and is also a notable part of the scene looking west, past the Queen's Hotel and along Baneswell Road.

2.3 The location of the site is illustrated in Figures 1 and 2, below.

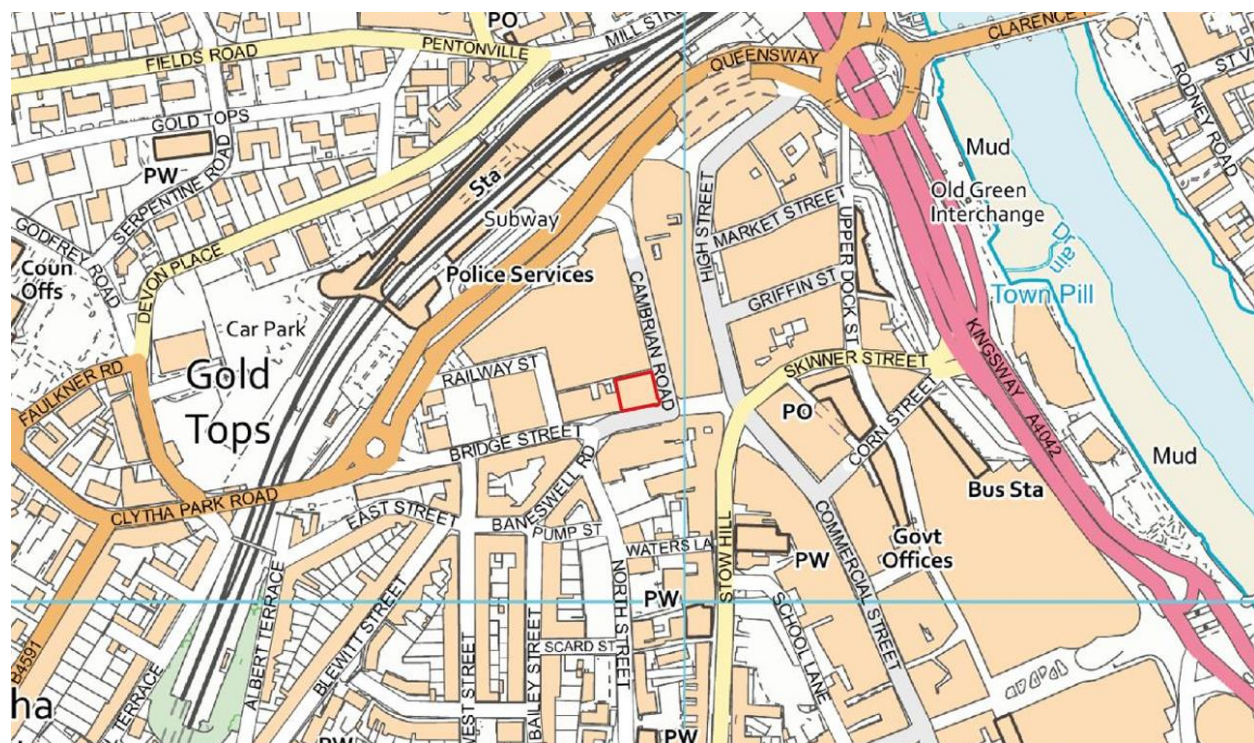


Figure 1: Site Location

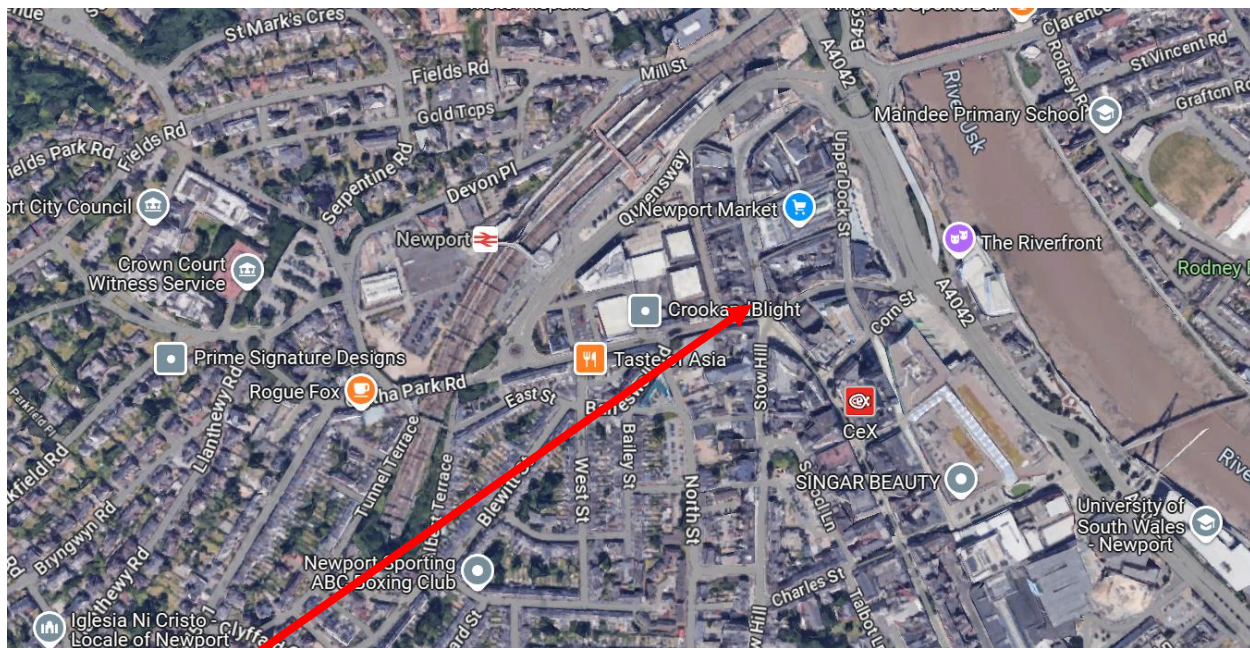


Figure 2: Aerial View of Site

2.5 Tredegar Chambers was officially designated as a Grade II listed building by Cadw on 31 March 2000. The listing description is as follows

History: Commercial development of shops with offices over; circa 1900.

Exterior: Large block of 4 storeys with 4 oriel windows, with, to R, on corner with Cambrian Road, 3,storey block. Free Renaissance style. Painted front to large block; corner block in red brick, with painted dressings. Large block has 3 pediments, central with relief decoration, and inscription "Tredegar Chambers". On top floor, central semi circular window with 5 round-headed windows to each side. On first and second floors, 4 two-storey oriel windows. On ground floor, the 2 modern shopfronts to L lack fascia board. Shopfront to R faces both Bridge Street and Cambrian Street; deep fascia board with cartouches to Bridge Street and over corner bay; shop windows articulated by granite piers; granite stall risers; columns flank corner entrance.



Reasons for Listing: Well preserved commercial block, typical of Newport at the height of its economic power. Group value with listed National Westminster bank, on opposite corner of Cambrian Road.

- 2.6 The property is strategically well placed within the City Centre with all services and amenities including a bus and railway station, as well as employment opportunities within easy walking distance.

3.0 Background

- 3.1 The applicant has sought a collaborative approach with the Council through seeking paid pre-application advice (reference: PS/24/0014). The letter dated 5th April 2024 concluded that:

“The proposals appear acceptable in principle but any future application must be accompanied by additional information and significantly more details as per the advice above. In my view, subject to a good quality application that has regard to the advice given in this letter and listed building consent submission being received, the proposals are likely to be supported. However, please note the points of concern raised above that will need to be addressed and/or justified.”

- 3.2 This advice has been adhered to and the following accompanies this submission:

- Heritage Impact Assessment and Photographic Record (Appendix 3)
- Noise Impact Assessment
- Structural Assessment Report
- PRA- Preliminary Roost Assessment
- Damp Report
- Noise Assessment
- Waste management



- Viability Assessment Report

4.0 Proposal

4.1 Full planning permission and listed building consent is therefore sought for the following:

- 15 apartments
- 5 retail units on the ground floor

4.2 The schedule of accommodation proposed is as follows

Ground floor

- 5 retail units
- Bin and bike storage
- Access to apartments

First floor

- 6 Apartments

Second floor

- 5 Apartments

Third floor

- 4 Apartments

4.3 The proposed works predominantly relate to the interior of the building, with works to its exterior being limited to restoration and repair works devised in consultation with heritage restoration experts, and the alteration of modern signage in order to create a more uniform street front with historic signage, conserving and bringing the building's elevations further into line with its historic character. The proposal



will be beneficial for the aesthetic value of the building and the appearance and character of the Stow Hill Conservation Area.

- 4.4 To promote sustainable forms of travel the proposal will be a car free development. Bike storage along with bin and recycling storage is proposed at ground floor.
- 4.5 As copy of the proposed site layout, floor plans and elevations are provided in the submitted drawings accompanying this application.

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 Planning Policy Wales sets out the land use planning policies of the Welsh Government. This contains guidance for the preparation of Local Authority's development plans, development management, and sets out the WG commitment to creating sustainable developments.

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) is the development plan for the purposes of the Planning and Compulsory Purchase Act 2004. The relevant polices are referred to below.

- SP1 (Sustainability)
- SP3 (Flood risk)
- SP9 (Conservation of the Natural, Historic and Built Environment)
- SP13 (Planning Obligations)
- SP18 (Urban Regeneration)
- GP1 (Climate Change)
- GP2 (General Amenity)
- GP3 (Service Infrastructure)
- GP4 (Highways and Accessibility)



- GP5 (Natural Environment)
- GP6 (Quality of Design)
- GP7 (Environmental Protection and Health)
- CE7 (Conservation Areas)
- EM3 (Alternative uses of employment land)
- H4 (Affordable housing)
- H8 (Self contained accommodation)
- W3 (Waste)

Supplementary Planning Guidance (SPG)

The following SPG is relevant:

- Parking Standards;
- Affordable Housing;
- Flat conversions;
- Wildlife and development; and
- Waste storage and collection

6.0 Planning Appraisal

6.1 This section seeks to highlight the main issues relevant to the determination of the application and assesses the scheme against the local and national planning policies and guidance referenced in section 6.0 above.

6.2 In formulating the proposal, special regard has been given to the more detailed requirements of the suite of local and national planning policy. The requirements and standards of these documents have heavily influenced the final scheme,



ensuring that a development of the highest possible quality, appropriate to its setting, is submitted for approval.

- 6.3 The main issues that are considered pertinent to the appraisal of this proposal are:
- The principle of development;
 - The design of the proposal and its impact on the character and appearance of the Grade II Listed Building and Conservation Area;
 - The impact of the development on local residential amenity;
 - Amenity for future occupants;
 - Transport matters;
 - Biodiversity.

A) The principle of development

- 6.4 The application site comprises a parcel of previously developed, or 'brownfield', land, situated within the urban boundary. One of the core principles in local and national planning policy is that planning should encourage the effective use of land by reusing land which has been previously developed (brownfield land). The LDP also promotes mixed-use developments and encourages patterns of growth which focus significant development in locations which are, or can be made, sustainable.
- 6.5 In accordance with the provisions of local and national planning policy, the proposal constitutes effective use of previously developed land in a sustainable location for a comprehensive mixed-use redevelopment proposal. The scheme would deliver significant social, economic and environmental regeneration benefits.
- 6.6 The proposal will deliver a scheme that will bring this building back into use and restore it to its former glory.
- 6.7 Turning to the provision of self-contained flats, 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.”*

6.8 The principle of the change of use of this property within the defined settlement boundary within the heart of the City Centre to create 15 apartments and 5 retail units is considered to be acceptable and represents an efficient re-use of the property.

6.9 It should be noted that the continuation of the use of the upper floors of the property as commercial space is simply not viable and a Viability Assessment that corroborates this is provided in support of this application.

6.10 The residential units are delivered in order to create an active community at the site and the mix proposed is one that is acceptable.

6.11 The principle of housing development in this location is entirely appropriate and in accordance with policy H8 of the LDP.

6.12 The development of the site for a sustainable development of residential purposes would represent a more appropriate use of the land, and make use of previously developed land within the urban boundary.



- 6.13 By ensuring a vibrant and by significantly improving the built environment and local amenity, in addition a public benefit will be felt.
- 6.14 As the development results in the creation of residential accommodation, along with the retention of 5 retail units at ground floor are a form of highly sustainable development, located on previously developed land within the defined urban area, it is asserted that the principle of development is acceptable in this instance, in compliance with local and national planning policy.

B) The design of the proposal and its impact on the character and appearance of the Grade II Listed Building and Conservation Area

- 6.15 Planning policy at a local and national level require development to create high quality buildings and places in which people want to live and work.
- 6.16 The proposed development will function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this, the proposed development will be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 6.17 The creation of a mix of uses will create a sense of place that is safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 6.18 A high quality approach has been taken to optimise the capacity of the site to achieve the aspirations of delivering housing at the site whilst fully considering its impacts on the area including on townscape and local amenity.
- 6.19 The scheme has been designed to respond to the historic importance of the building, as well as enhancing its setting within the designated Conservation Area. The scheme has evolved to ensure the scheme is right for the local area.



- 6.20 In addition, a Heritage Impact Assessment has been submitted with the proposal, which finds that:

“The impact of the proposed development on The (Newport) Town/City Centre Conservation Area, and Listed Buildings and locally important buildings therein, with specific consideration of: the Lamb PH; National Westminster Bank (including Nos.2 & 4 Cambrian Road); Pedestal & Statue of Sir Charles Morgan; HSBC (formerly Midland Bank); 34 & 35, High Street, Gwent; Queen’s Hotel; and 31, 32, 33 High Street, including 2a & 2-4 Skinner Street; all of which are Grade II Listed Buildings which reside in close proximity to Tredegar Chambers, can be assessed as Neutral to Slight.

This assessment reflects the High significance of the Conservation Area and the Grade II listed buildings in the site’s immediate setting, considered against the magnitude of impact, assessed as No Change to Negligible. The proposed works to the exterior of Tredegar Chambers are very limited, principally comprising restoration and repair works, the specifics of which are not yet known but are to be determined in consultation with experts in heritage restoration techniques, as well as alterations to modern signage to create uniformity with the building’s historic signage. These works are considered to have a positive impact on the assets’ settings, improving the appearance of a highly visible and large building within their setting, and only making alterations to its appearance towards cohesive ground floor signage in line with its surviving historic signage.”

- 6.21 Overall, the proposals will be highly beneficial to the building’s aesthetic value and will also help conserve the existing structure, benefitting its evidential value thus complying with Policy CE7 of the LDP.

C) The impact of the development on local residential amenity

- 6.22 Policies GP2 and H8 of the LDP seeks to ensure that proposals would not have a detrimental impact on the amenity of neighbouring properties.



- 6.23 The surrounding area is characterised by a dense urban landscape, with tightly packed development and a range of local amenities in close proximity. There is no indication that the proposed commercial use of the property, along with the provision of 15 apartments would negatively affect neighbouring properties. This is due to the appropriate separation distances that will be maintained between the development and surrounding buildings.
- 6.24 The proposed uses are suitable for the size and scale of the property and are not expected to compromise the amenity of nearby properties. There is no evidence to suggest that the development will result in any notable increase in noise or disturbance.
- 6.25 In conclusion, the proposal will not have a significant adverse impact on the amenity of neighbouring properties, ensuring compliance with Policies GP2 and H8 of the Local Development Plan (LDP).

D) Amenity for future occupants

- 6.26 The Council's Supplementary Planning Guidance (SPG) on flat conversions provides comprehensive guidance on internal space standards for residential units. All proposed units will meet or exceed these required internal floor space standards, ensuring ample living space for future residents. Moreover, the central location ensures easy access to a variety of services and amenities within the City Centre, further enhancing the convenience and desirability of the property.
- 6.27 The findings of the Noise Impact Assessment demonstrate that the proposed development will not result in any unacceptable levels of noise disturbance to future occupants or neighbouring properties. The assessment thoroughly



evaluated the potential noise sources in the surrounding area, including traffic, nearby commercial activities, and other environmental factors. Based on these findings, it was concluded that the noise levels both internally and externally will remain within acceptable limits as set by relevant standards and guidelines.

- 6.28 To ensure a high standard of living, appropriate noise mitigation measures will be incorporated into the design of the development. These include high-performance glazing, enhanced sound insulation between residential units, and other acoustic treatments where necessary. These measures will effectively minimise any potential noise intrusion, ensuring that future residents experience a quiet and comfortable living environment.
- 6.29 The Noise Impact Assessment also confirmed that the commercial uses proposed for the ground floor will not generate any significant noise that could negatively affect the amenity of surrounding properties or the new residential units. The separation distances, along with the design and layout of the building, ensure that any operational noise will be adequately managed.
- 6.30 Overall, each flat will offer a high standard of living, with every room benefiting from good natural light, ventilation, and a clear outlook, ensuring the accommodation is light, spacious, and airy. Apartment 15 will benefit from window openings serving all rooms that will allow light and natural outlook. The proposal further complies with local and national noise control standards, ensuring that future occupants and neighbouring properties will not be adversely affected by noise. This aligns with the findings of the Noise Impact Assessment and supports the overall sustainability and suitability of the development. The proposal is therefore fully compliant with the Council's SPG on flat conversions, providing a well-designed and comfortable living environment for future occupants. is therefore compliant with the Council's SPG relating to flat conversions.



E) Access arrangements and Parking

- 6.31 One of the key objectives of national planning policy is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable and accessible.
- 6.32 Support is given to schemes where opportunities to promote sustainable transport modes can be taken, the number and length of journeys needed for a range of uses can be minimised, and safe and suitable access to the development site can be achieved for all users.
- 6.33 The proposed development will be car free given the constraints of the site and the proximity to the City Centre, as well as the sites location within parking zone 1.
- 6.34 The development will be car free and the use of sustainable forms of transport are promoted.
- 6.35 Due to the proximity of the property to a range of local amenities and services within the City Centre that are within 800m, which is within an easy walking distance. Future occupants will be attracted to the property by virtue of its proximity to good public transport links, as well as its location within the Local Centre.
- 6.36 In relation to cycle parking a dedicated bike store will be located at ground-floor level. There will be two separate bike stores, with one to serve the residential dwellings and a second to serve the existing commercial.
- 6.37 The development proposals are considered to result in a negligible impact on the local highway network, public transport network, and local walking and cycling infrastructure and would not have a detrimental impact on highway safety.



- 6.38 In terms of accessibility and sustainability, the development with easy access to a several local services, facilities and amenities possible on foot, via a dedicated pedestrian footway. The nearby bus station provide further options for sustainable forms of transportation to serve the development.
- 6.39 Overall, the development would be located within a sustainable and accessible urban area, be suitably served by sustainable forms of transportation, adequate site access and cycle provision. Accordingly, the proposal is compliant with Policies GP4 and H8 of the LDP.

F) Biodiversity

- 6.40 The applicant has commissioned a Preliminary Roost Assessment (PRA) and no evidence of roosting bats was found within the building. Further to this the PRA that the proposal provides an opportunity to enhance the Site for roosting bats by providing a suitable roosting feature for bats. This can be provided in the form of two bat boxes. It is recommended that two bird boxes are also installed. The plans illustrate the provision of a sparrow terrace and two bat boxes.
- 6.41 The proposal will deliver ecological enhancements to secure a significant biodiversity net gain and enhancement of the area.
- 6.42 In light of the above, the proposal will therefore deliver biodiversity enhancements and fully addresses the previous refusal reasons.

7.0 Design and Access Statement

- 7.1 The purpose of a Design and Access Statement (DAS) is to provide a clear and logical document to demonstrate and explain the various facets of design and access in relation to the site. The DAS also acts as a method of demonstrating the details of a planning application in a way that can be read both by professionals and the public. The diagram below, extracted from the Welsh Government



guidance on preparing a DAS, illustrates the various considerations that need to be taken into account when preparing such a document.



Figure 3: Objectives of good design

7.2 The circular nature of the diagram represents the equal weightings that need to be given to each of the 5 Objectives of Good Design: Access; Movement; Character; Environmental Sustainability and Community Safety.

i) Access

7.3 The building occupies a sustainable location with easy access to a range of amenities, services, and transport links and are easily accessible by different forms of transport. The position of the site therefore offers no barriers for those accessing the site by foot or car. A level threshold is provided into the building.



7.4 As part of the developing package of management measures, those responsible for the completed project will be made aware of their responsibilities. Under the Equality Act 2010 the need to maintain facilities providing for an accessible environment are important issues to be considered including:

- Ensuring that a suitable Access Strategy has been developed identifying design detailing and the management of the Equality Act process from the inception of the complex through its whole life. This document along with the proposed building plans and Building Regulation consultation / approval are also important in this respect.
- Ensuring suitable management and personnel policies in respect of disability, both for all visitors.
- Communication issues such as information, signage / wayfinding are all-important and need to be maintained.
- Management of the building e.g. ensuring where possible that the facilities are suitable to allow wheelchair user suitable space, updating and improving wayfinding systems, as appropriate.
- Maintenance – it is vitally important that all aspects of accessibility are maintained (e.g. keeping access routes clear, maintaining doors, keeping floor, external surfaces and sanitary facilities clear, replacing blown light bulbs).
- Awareness – where a service is provided, ensuring there is information available on the facilities and access available for disabled people. This can be via publicity material (adverts, website), or in arranging to visit the building.
- Future work – ensuring future work does not compromise access issues.



ii) Character

- 7.5 Policy CE7 requires all development within or adjacent to a Conservation Area to be designed to preserve or enhance the character and appearance of that Conservation Area and sets out similar criteria to help achieve this. The LDP also refers to the statutory duties and responsibilities of all parties towards Listed Buildings to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 7.6 At the heart of the proposal is to ensure a vibrant reuse of this designated heritage asset. The overarching aim of the proposal is to convert this vacant building to ensure that it enhances the contribution it makes to the Conservation Area and enhance its prominent setting.
- 7.7 The proposal intends to utilise the existing fabric of the building. It is also intended to retain the commercial element within the main frontage at ground floor, to ensure a vibrant frontage and encourage increased footfall within this part of the City Centre.
- 7.8 The proposed minor nature of the works proposed would complement the existing building and enhance its immediate setting.
- 7.9 Overall, the use proposed and minor nature of the interventions will allow a vibrant re-use. The sensitive re-use of this vacant property will preserve the character and setting of the Conservation Area.



iii) Movement

7.10 The site occupies a sustainable location, and active travel will be encouraged, given the proximity to a frequent bus service.

iv) Community Safety

7.11 The proposal would ensure a continued presence within the building during all times of day and night that will help discourage crime and anti-social behaviour.

7.12 The proposed change of use from office space to 15 apartments meets *Secure by Design* standards by incorporating key principles that enhance safety and security within the development. The design includes controlled access points, ensuring that only residents and authorised personnel can enter the building. Communal areas are well-lit and designed to offer clear sightlines, reducing the risk of concealed spaces. Security measures such as CCTV, secure entry systems, and reinforced doors and windows have been integrated to deter unauthorised access and promote a safe living environment. The layout also encourages natural surveillance, with apartments overlooking shared spaces and surrounding streets, contributing to a secure and cohesive community.

v) Environmental Sustainability

7.13 As touched upon above, the site occupies a sustainable location with access to a range of amenities. The proposal intends to use the fabric of the existing building, so therefore minimises the need to use natural resources. The proposal therefore represents a sustainable re-use of an existing building.

8.0 CONCLUSION

8.1 In conclusion, the proposal with amendments to the design and the provision of additional technical evidence has fully addressed the previous refusal reasons. It



would deliver significant regeneration benefits. The proposed development would ensure that the building is sympathetically restored with an acceptable beneficial use. Furthermore, sustaining the economy is a vital element of sustainable development, and the latter is about positive growth. Progress has to be made for the betterment of the local economy and social community. The proposal would deliver significant socio-economic benefits through the creation of a vibrant re-use of the property, as well delivering a much-needed homes and the associated regeneration benefits.

- 8.2 The site makes the more appropriate and efficient use of this vacant building, in a location which has access to a number of local services, facilities and amenities by sustainable transportation modes.
- 8.3 The use of the site would ensure a vibrant reuse of this vacant building whilst improving the sense of place and further public benefit through enhancing the character and appearance of the Conservation Area as well renovating this designated heritage asset.
- 8.4 The proposal would be served by suitable access and would have an acceptable impact on local residential amenity, improving the visual amenities of the area. It ensures that the development secures a net gain in biodiversity, and is also acceptable in respect of flood risk.
- 8.5 The scheme is fully compliant with the suite of local and national planning policies. It is therefore requested that planning permission and listed building consent is granted for the proposed development.