

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 25/09/2025 4:32 PM

Application Summary

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|---------------|--|
| Address: | 16-18 Cambrian Road Newport NP20 4AB |
| Proposal: | CHANGE OF USE OF FIRST AND SECOND FLOORS FROM RETAIL (CLASS A1 USE) TO 2 NO. ONE BEDROOM FLATS |
| Case Officer: | Marnie Ostler |

[Click for further information](#)

Customer Details

| | |
|----------|---|
| Name: | |
| Email: | |
| Address: | Music Venue Trust 120-124 Curtain Road London |

Comments Details

| | |
|-----------------|--|
| Commenter Type: | Other |
| Stance: | Customer objects to the Planning Application |

Reasons for comment:

Comments: REF: 25/0646, 16-18 Cambrian Road Newport NP20 4AB-
CHANGE OF USE OF FIRST AND SECOND FLOORS FROM RETAIL (CLASS A1 USE) TO 2 NO. ONE BEDROOM FLATS

Dear Sir / Madam,

Music Venue Trust is a UK registered charity that acts to protect, secure, and improve the UK's grassroots music venue circuit. We provide advice to the government, the cultural sector and the music industry on issues impacting the network of over 800 venues we represent, the Music Venue Alliance.

We are writing to you today in representation of one of those grassroots music venues - The Cab, Newport which, as an important cultural venue is a member of our Music Venues Alliance.

There is currently an application for the change of use of the first and second floors of the building at 16-18 Cambrian Road to create two single bedroom flats. The application is in close proximity to The Cab at 22 Cambrian Road, the buildings forming part of the same terrace.

Having reviewed the documents, the application 25/0646 in its current format presents an

increased risk that the development will lead to excessive noise complaints from incoming residents. The proximity of new residential units to The Cab would place the future of the grassroots music venue under sustained risk of permanent closure, undermining the Agent of Change principle set out in national planning policy.

Our concerns are informed by experience and statistical analysis of the sector. Music Venue Trust has a 'hotline' resource to the Music Venue Alliance called the Emergency Response Service. Through this we're directly observing the impact noise complaints have on Grassroots Music Venues, the financial outlay operators have had to make as a direct result, and the escalation of policing of the spaces by Environmental Health Officers.

In 2024, the Music Venue Trust Emergency Response Service saw a significant increase in emergency cases, and recognised a correlation between areas of redevelopment or change of use and spikes of noise complaints. Threats to grassroots music venues from noise complaints were a key trend, while noise abatement orders and other neighbour disputes were identified as a contributing factor to permanent closure.

Every grassroots music venue that closes represents one less place where local communities can access affordable live music, decreased opportunities for new and emerging artists to perform live and fewer opportunities for event professionals to learn their trade. Once venues close, they rarely reopen.

To avoid the increased risk of closure of this grassroots music venue, this application must be refused allowing these concerns to be addressed: -

Points of Consideration:

The application 25/0646 is in close proximity to the existing grassroots music venue The Cab, despite this the Design and Access Statement for the application does not recognise The Cab as a constraint to the proposed conversion, so this application cannot give assurances that The Cab has been accurately mapped and accounted for in the environment the proposed design seeks to change.

The noise impact assessment NALPR170524.01 dated 04/06/2024 by Noise Assessments Limited makes no mention of The Cab grassroots music venue.

Within the NIA, measurement and subjective impressions of music noise have not been noted, and no assessment of risk of low frequency music noise has been conducted.

The NIA cannot therefore be regarded as an accurate data picture, and the design plans derived from it cannot be said to be suitable to mitigate against the noise and vibrations of the existing environment.

If the development were to proceed without adequate consideration and mitigation of disturbance caused by music noise, this risks complaint by future occupiers, which would be a clear failure to uphold the Agent of Change principle enshrined in the National Planning Policy Wales.

National Policy and Guidance Conflicts

We would like to take this opportunity to underscore national policy guidance.

At a national level, the Agent of Change principle in the Planning Policy Wales is very clear that the responsibility to effectively mitigate the impact of the proposed redevelopment on existing businesses falls to the developers who act as the "Agent of Change".

The agent of change principle was introduced in May 2017 by the then Cabinet Secretary for Environment and Rural Affairs, Lesley Griffiths MS. The letter to all heads of planning, entitled "Supporting the Night Time Economy and the Agent of Change Principle" includes:
"Under the agent of change principle, if new developments or uses are to be introduced near a pre-existing business, such as a live music venue, it is the responsibility of the developer to ensure solutions to address and mitigate noise are put forward as part of proposals and are capable of being implemented."

The intention of the Agent of Change principle can best be seen in highlighting the following passages from the Planning Policy Wales, Edition 12:

Paragraph 3.55 "There may be instances where it may not be possible to develop sensitive uses on previously developed land without placing unnecessary constraints on adjacent existing businesses and activities which require that particular location. In such circumstances the agent of change principle will be a relevant consideration."

Paragraph 4.3.44 "Where residential development is proposed next to or near existing evening and night time uses, such as those described, it will be necessary to consider the compatibility of uses and to incorporate mitigation measures to minimise any impact on the amenity of any future residents. The agent of change principle will be a guiding principle for supporting the evening economy and the development of uses sensitive to the soundscapes experienced in busy commercial centres."

Paragraph 6.7.5 - "The agent of change principle says that a business or person responsible for introducing a change is responsible for managing that change. In practice, for example, this means a developer would have to ensure that solutions to address air quality or noise from nearby preexisting infrastructure, businesses or venues can be found and implemented as part of ensuring development is acceptable."

Paragraph 6.7.6 - "In proposing new development, planning authorities and developers must, therefore:
• address any implication arising as a result of its association with, or location within, air quality management areas, noise action planning priority areas or areas where there are sensitive receptors;
• not create areas of poor air quality or inappropriate soundscape; and
• seek to incorporate measures which reduce overall exposure to air and noise pollution and create appropriate soundscapes."

Paragraph 6.7.23 "When considering the formulation of strategies or individual proposals, bearing in mind the agent of change principle, it will be necessary to identify the nature of the soundscape which exists in an area and the characteristics of the place, or specific activities, which have shaped it."

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Whilst the Newport Local Development Plan pre-dates both Planning Policy Wales, and the instruction to heads of planning to implement Agent of Change policy in 2017, allowing this development would still be contrary to several stated aims of that LDP. Examples include: Policy GP2 (General Development Principles - General Amenity) of the Newport Local Development Plan 2011-2026. That policy requires new development to not be "detrimental to the visual amenities of nearby occupiers or the character and appearance of the surrounding

area."

Policy GP6 states "All development should be sensitive to the unique qualities of the site and respond positively to the character of the area."

Policy GP7 says "Development will not be permitted which would cause or result in unacceptable harm to health because of ... noise or light pollution ... or any other identified risk to environment, local amenity or public health and safety."

Conclusions

The Cab is well regarded locally and nationally as a grassroots music venue; Music Venue Trust makes the point to industry and government that grassroots music venues are the "research and development" arm of the multi-billion pound British music industry, and organisations such as The Cab serve to offer emerging artists the opportunity to perform live, hone their craft and develop their artistic careers. The Cab is providing a valuable service which aligns with and contributes to much of the cultural and economic strategy of Newport Council's Local Development Plan.

It is crucial that consideration of this planning application should take into account the important position that The Cab plays in the cultural fabric of Newport. The council must ensure that proposed developments do not have an adverse impact on existing cultural spaces and that the impact of development on existing venues is adequately managed, as such the application is unfit for purpose for these key points:

By nature of its proximity to a GMV, this application runs contrary to local and national planning policy commitment to Agent of Change.

The Design and Access Statement for the application does not recognise The Cab as a constraint to the proposed conversion.

The Noise Impact Assessment commissioned makes no mention of The Cab grassroots music venue, and no assessment of risk of low frequency music noise has been conducted.

It cannot therefore be said with confidence that necessary protections are at all robust in order to mitigate the noise created by the venue's important cultural work and any future residents of the planned development. The GMV would face an increased risk of noise complaints which would impact upon its ongoing viability.

Music Venue Trust has serious concerns over the planning application in its current form, and it is of the utmost importance that the developer takes into account the scope and breadth of the musical output of the venue. Planning Policy Wales specifically says that "it will be necessary to identify the nature of the soundscape which exists in an area and the characteristics of the place, or specific activities, which have shaped it". The planning application 25/0646 does not do this.

The proposed planning application would actively undermine the Agent of Change principle that Planning Policy Wales is committed to. On this basis, the application should clearly be refused.

Kind regards