

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 22/04/2026 5:36 PM

Application Summary

Address:	51-52 High Street Newport NP20 1GA
Proposal:	CHANGE OF USE FROM OFFICE TO AN APART HOTEL (SUI GENERIS) AND ASSOCIATED WORKS
Case Officer:	Marnie Ostler

[Click for further information](#)

Customer Details

Name:	
Email:	
Address:	Strongroom, 120-124 Curtain Road London

Comments Details

Commenter Type:	Other
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	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 three of those grassroots music venues: Le Pub; McCann's Rock N Ale Bar and; The Corn Exchange, Newport. which as important cultural venues, are all members of our Music Venues Alliance. There is currently an application for the change of use of office (Use Class E) to an apart Hotel (Sui Generis / C1 equivalent) proposing up to 12 units. The application is in close proximity to all three grassroots music venues, the application being for a building between 15- 50 metres of the venues. Having reviewed the documents, the application 26/0212 in its current format presents an increased risk that the development will lead to excessive noise complaints from incoming residents. The proximity of a new, noise sensitive use to Le Pub, McCanns and Corn Exchange would place the future of these grassroots music venues 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. There is a direct correlation between areas of redevelopment and spikes of noise complaints. The Music Venue Trust Annual Report 2025 records that last year the UK saw a loss of 78 GMVs who either closed or ceased hosting live music altogether. This is catastrophic for local communities, for musicians, for fans, and for the music ecosystem. Every GMV that closes represents one fewer space where local communities are able to access affordable and original live music, it results in 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.

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:

â-□ The application 26/0212 is in close proximity to the existing grassroots music venues Le Pub, McCanns and Corn Exchange. Despite this the application does not recognise any of the venues as a constraint to the proposed conversion, so this application cannot give assurances that they have been accurately mapped and accounted for in the environment the proposed design seeks to change. None of the venues have been notified of any of the submissions in relation to the application, despite the venues' close proximity. The application form itself admits to not consulting with neighbours or the local community.

â-□ The application 26/0212 proposes development of an Aparthotel in close proximity to existing grassroots music venues but there is no evidence that the applicant has taken consideration of the risk of noise impact on potential residents into account. There is no Noise Impact Assessment submitted with the application nor mitigation showing that the design of the application has been informed by accurate surveying. When placed at an increased risk of experiencing noise complaints, common resulting actions from local authorities (limitations on licensable hours, closure of outside areas) have direct ramifications on a venue's financial viability.

â-□ MVT expects applicants looking to develop residential units in proximity to operational venues to undergo noise reports in collaboration with impacted grassroots music venues, so as to ascertain noise levels at a worst-case scenario and assess their potential impact on residents of a proposed residential development. Such a process enables suitable mitigating measures to be determined. Since none of this evidence has been prepared and informed the development proposals, the application should be refused.

â-□ 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."

Newport Local Authority launched its ‘Newport Culture Strategy 2025-2035 - Empowering Culture, Transforming Communities’ last year. Of the five values and behaviours the strategy promotes, Community Focus is one:

Promote culture as an enabler to well-being - promote culture to promote physical, mental, and emotional well-being across the community.

One stated priority is Community Development – collaborating in the cultural strategy development process and delivery, longer-term decision-making and creating an enhanced offer overall that celebrates heritage, bilingualism and fosters pride in place.

Of the strategy’s Priorities and desired Outcomes:

Priority 1: Destination states:

Summary: We want Newport to be seen through the lens of our culture, as a diverse and dynamic city. We will invest in our cultural assets and work across sectors to ensure those assets are fully utilised. We will grow audiences across different art forms, festivals, and events with more visitors and residents taking part. Culture will be a key consideration in our regeneration projects, and in raising Newport’s international profile.

With performance venues listed as ‘key assets’ of the Cultural Strategy.

Outcome 2: Newport's cultural offer will be proactively marketed, play an increasing part in tourism and draw visitors from across Wales and the world with positive impacts on Newport's economy.

Outcome 3: Newport will have a coherent and focussed programme of cultural events, some of which will develop an increasing national and international profile and come to be part of the city's identity.

Outcome 4: Large-scale regeneration in Newport will seek to integrate culture and heritage into major residential and commercial developments. Priority 2: Community also includes the following desired outcome:

Outcome 6: Participating in culture will result in improved health and wellbeing for Newport residents.

Increase in the number of people who feel they can already take part in the creative and cultural activities in Newport that they want to.

Local strategy makes absolutely clear the commitment to protecting and promoting local community venues, which are seen as key assets. Conclusions

All three venues, Le Pub, McCanns and Corn Exchange are 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 these serve to offer emerging artists the opportunity to perform live, hone their craft and develop their artistic careers. These grassroots music venues are providing a valuable service which contributes to the cultural and economic offer of Newport and the wider County.

It is crucial that consideration of this planning application should take into account the important position that all of the venues play 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:

â-□ By nature of its proximity to three separate GMVs, without accounting for their existence, this application runs contrary to local and national planning policy commitment to Agent of Change. The application does not recognise these venues as constraints to the proposed development.

â-□ There has been no Noise Impact Assessment commissioned and so it cannot be said that the Agent of Change principle has been addressed at all.

â-□ Without a Noise Impact Assessment, it cannot be said with any confidence that necessary protections are at all robust in order to mitigate the noise created by this group of venues important cultural work, and sufficiently soundproof for any future residents of the planned development. These venues would therefore face an increased risk of noise complaints which would impact upon their ongoing viability.

â-□ Allowing the application to proceed in its current form would undermine not only National Policy, but also Newports own planning and Cultural Strategies. 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 venues surrounding the proposed site. 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 26/0212 does not do this.

In its current state this application does not provide necessary evidence that it would not adversely impact upon the music venue, and therefore 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. Yours sincerely,
REDACTED

Venue Support Manager, Music Venue Trust

Where did you hear about this application?

Not specified

Kind regards