

Planning Statement

14 - 18 Clarence Place, Newport

45 Croydon Way Ltd

October 2018

Contents

1.	Introduction	3
2.	The Application Site and Context	5
3.	Proposed Development	8
4.	Planning Policy Context	10
5.	Planning Analysis	16
6.	Conclusion	22
Appendix 1: Pre-Application Response		25

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1. Introduction

1.1 This Planning Statement has been prepared by Turley, on behalf of 45 Croydon Way Limited, in support of a full planning permission and listed building consent application for the partial demolition of the 14-18 Clarence Place, and restoration, extension and redevelopment of the building to provide for two commercial units on the ground floor (flexible range of Use Classes A1, A2, A3) along with a 58 bed hotel (Class C1).

1.2 The application proposal is described as follows:

‘Part demolition, restoration, redevelopment and extension of the listed buildings to facilitate change of use to a 58 bedroom hotel (Use Class C1) in two parts (2 and 4 storeys), 2 No. ground floor commercial units (flexible range of Use Classes A1/A2/A3), new landscaping, new rear access courtyard and associated development’.

1.3 The application site comprises 0.05 ha of brownfield land, located within the Clarence Place Local Centre, Newport. The proposal will facilitate the regeneration of the vacant and derelict Grade II Listed 14-18 Clarence Place (individual and group listing), bringing it back into beneficial use. The development will deliver two commercial units on the ground floor with a hotel above. It will bring a number of positive social, economic and environmental benefits in delivering effective regeneration in the local area.

1.4 The proposed hotel will be occupied by easyHotel, and the second easyHotel in Wales. The hotel reception will be provided at the ground floor, with bedrooms to the rear and across the three upper floors. Two commercial units will also be provided at the ground floor, fronting onto Clarence Place.

1.5 The proposal will retain the listed façade and the structure of the original buildings of 14-18 Clarence Place. These form part of a number of listed buildings located along Clarence Place, which are recognised due to their value as a group. The proposal will sensitively restore the building façade, and provide an active frontage along Clarence Place. The proposal will secure the long-term optimum viable use of the building and the protection of this important heritage asset, which is currently at risk due to the current dilapidated state of the building.

1.6 This Statement should be read in conjunction with the Design and Access Statement prepared by Base Associates, Heritage Statement, prepared by EDP, Noise Assessment, prepared by Ion Acoustics, Bat Survey prepared by EDP, Flood Consequence Assessment prepared by RSK and a Transport Assessment prepared by TPP, along with other documents and drawings submitted in support of this application. It is not our intention to reference each element of these documents, albeit their findings will be summarised where necessary and for ease of reference.

Context

1.7 This Report is intended to assist Newport City Council (NCC) in its determination of the application and has been prepared in accordance with the requirements set out in Planning Policy Wales (PPW) and the adopted Newport Local Development Plan (adopted January 2015). It seeks to evaluate the proposed development against

national and local planning policies, taking into account relevant material considerations.

Report Structure

1.8 The remainder of the report is structured as follows:

- Section 2: describes the application site and its surroundings.
- Section 3: describes the proposed development.
- Section 4: sets out the planning policy context against which the proposal should be assessed.
- Section 5: provides an assessment of planning considerations.
- Section 6: presents our conclusions.

2. The Application Site and Context

- 2.1 The application site is located along the southern side of Clarence Place, which forms a key route into Newport City Centre, across the adjacent bridge over the River Usk. The site represents a gateway to the city centre when approaching from the east.
- 2.2 The site is located within Clarence Place Local Centre, as designated within the adopted Newport City Council Local Development Plan (LDP) (2015). Clarence Place is designated within the LDP as one of six City Centre Districts which form priority areas and a focus for redevelopment in the City Centre. The surrounding area is comprised of a mix of uses including a variety of commercial and residential uses.
- 2.3 The application site extends to approximately 0.05ha and was previously occupied by TJ's Nightclub. The nightclub was a local landmark given its links to Newport's music scene. The unit has now been vacant for an extended period of time, dating back to 2011.

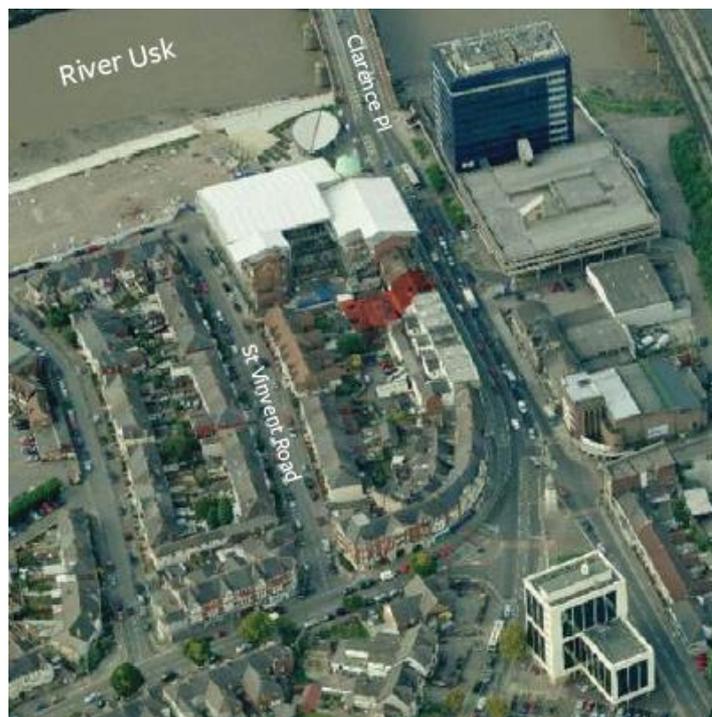


Figure 1 – Site location

- 2.4 14-18 Clarence Place is located in a group of 5 Grade II Listed Buildings, extending from 10 to 18 Clarence Place. The buildings date to 1909 and are comprised of 3 storey premises built of brick and stone. The buildings were designated as an integral part of this early C20 commercial development, with group value with the Technical Institute to the west and Nos 20-34 Clarence Place to the east.
- 2.5 The building has been vacant since 2011, and has become derelict and structurally unsound in parts. Whilst the façade is principally complete (albeit in need of significant repair), the roof is beyond repair and internally, the building requires complete

renovation. At present, the building no longer makes a positive contribution to the street scene. Without significant works, the premises are considered to be at risk of further deterioration and complete dilapidation.

- 2.6 The site is bound by Clarence Place to the north, with Kwik Fit, Clarence House (a 10 storey office building) multi storey car park and Iceland Food Store at the ground floor located directly opposite. To the east and west are the adjacent terrace of properties along Clarence Place, a number of which are vacant. Those in active use are occupied by a range of commercial uses, in addition to offices and residential uses at upper floors.
- 2.7 Access to the site is via Clarence Place, with a secondary access point to the rear via a lane accessed from St Vincent Road. The site is located within walking distance of Newport City Centre. Bus stops are located adjacent to the site on Clarence Place, providing frequent services into Newport City Centre, as well as to a range of destinations including Ringland, St Julians, Liswerry and Caerleon. Newport Railway Station is located approximately 644m to the west of the site, providing access to services across Wales and England. The site is located in a highly accessible and sustainable location.

Relevant Planning History

- 2.8 A number of planning applications have been submitted at the application site, but these have only limited relevance to that currently proposed.
- 2.9 The most recent application of relevance (reference no: 03/1197) was granted in June 2004. It relates to a change of use application for 12-16 Clarence Place to provide an extension to an existing nightclub. The application was approved under the condition that the rear of the unit only operates as a restaurant ancillary to the nightclub.

Pre-Application Advice

- 2.10 Pre-application dialogue has taken place with officers from NCC planning, highways, conservation, ecology and regeneration departments. The applicant has liaised proactively with the Council to ensure that the proposal brings this dilapidated building back into use, providing a positive addition to the local centre, whilst also ensuring that the scheme respects the listed building. Through dialogue with the Council, the design has evolved to provide the submitted scheme.
- 2.11 The Council response confirms that the proposal is acceptable in principle. It is welcomed by officers as a potential solution to the problem of the currently at risk listed building. The response recognises that the proposals provide a real opportunity to bring back the historic character of the front elevation and make a positive impact to this neglected site, whilst also providing significant regeneration and economic benefits to both the city centre and local centre.

2.12 Officers also confirmed their view that:

- The listed buildings are in a very poor state of repair, being subject to current enforcement notices.
- The Council is minded to adopt (as far as is reasonable) to adopt a pragmatic approach to a viable re-use of the derelict listed building.
- Clarence Place is a specific project area in the Newport City Centre Masterplan (2018), which aims to rejuvenate the area.
- Prevailing development plan policy provides support for regeneration and tourism schemes in this locality, with the potential benefits of the scheme capable of being afforded significant weight.
- The mix of uses (with the re-instatement of 2 commercial units at ground floor level) is acceptable and welcomed in this location.

2.13 Officers summarised their informal view that, in principle, the scheme has significant merits. Notwithstanding this, key matters to be addressed include:

- The design, scale and massing of the proposal will need to respect the existing building.
- Whilst the proposal would meet the justification test in Technical Advice Note 15 (Flood Risk), a Flood Consequence Assessment is required.
- The design, scale and massing of the development the development will need be respectful of residential amenity.
- Car parking will need to be carefully considered, taking into account the likely ability to demonstrate a reduction in parking demand compared to the lawful use of the site as a night club.
- A full noise assessment is required in support of the application.

2.14 A copy of the written pre-application response from officers is attached at **Appendix 1**.

2.15 The pre-application advice from officers has informed the design evolution of the proposed development.

3. Proposed Development

- 3.1 As outlined in Section 1 of this report, this full planning and listed building consent application proposes the following:

‘Part demolition, restoration, redevelopment and extension of the listed buildings to facilitate change of use to a 58 bedroom hotel (Use Class C1) in two parts (2 and 4 storeys), 2 No. ground floor commercial units (flexible range of Use Classes A1/A2/A3), new landscaping, new rear access courtyard and associated development’.

- 3.2 This application proposes the redevelopment of the application site, including the retention of the façade of the Grade II Listed 14 – 18 Clarence Place. The proposal will include the partial demolition of the building. The modern single storey addition to the original building is to be demolished and replaced with a new 4 storey building that steps down to 2 storeys towards the rear of the site. The proposal will be occupied by a 58 bed easyHotel, along with two separate commercial units (circa 90.12 sq m in total across the two units) at the ground floor. The application also includes associated ancillary works, including new landscaping and rear access courtyard.
- 3.3 As outlined above, the proposal will retain the existing façade, along with the internal layout immediately to the rear (forming the 3 dimensional shape of the original building). The existing roof, which is beyond repair, will be removed, along with the demolition of the single storey element to the rear. This will be replaced by a new mansard roof, along with a four storey extension to the rear, which steps down to two storeys towards the rear boundary.
- 3.4 The façade will be carefully restored and integrated with the new build elements of the scheme. The new low profile mansard roof will be set behind the existing stone balustrade provided within the front elevation, which will ensure that the prominence of the façade is retained. Two new commercial units and the hotel reception will be provided on the ground floor, creating a positive and active street frontage to Clarence Place, thereby enhancing natural surveillance and activity.
- 3.5 The extension to the rear will be four storeys in height, but set back from the rear boundary at floors two and three, in order to ensure an appropriate relationship with the adjacent properties (which front onto St Vincent Road). Windows at floors 1 to 3 will be splayed, in order to provide oblique views and minimise overlooking of adjacent properties.
- 3.6 In view of the historic nature of the site, a simple and minimal range of appropriate materials are proposed. Red brick is proposed to match the existing building, alongside dark grey render and slate roof tiles.
- 3.7 Owing to the site’s sustainable location, and having regard to the physical nature of the premises itself, car parking is not proposed to be provided on site. A total of 14 cycle parking spaces will be provided on site for use by staff and hotel visitors.
- 3.8 The redevelopment of the application site will bring about significant regeneration benefits by securing the long-term viable use of the designated heritage asset. It will

provide much needed additional hotel accommodation and modern commercial units in a currently underutilised, brownfield site within the local centre. The proposal will create a high quality development that will positively enhance the street scene, whilst respecting the character and appearance of the listed façade.

The easyHotel Brand

- 3.9 easyHotel was founded in 2004, as a 'super budget' hotel group, and open their first hotel in London in 2005. The company now has an estate of 33 hotels, with a total of 3,068 rooms located across the UK, Europe and Dubai. The proposed easyHotel at Clarence Place will represent the company's second hotel in Wales, with a hotel in Cardiff currently in development.
- 3.10 easyHotel aims to provide a great bed, well-trained staff and well-designed rooms, within a good location and at a low price.
- 3.11 The branded budget sector has grown faster than any other sector in the UK hotel industry for the last 30 years, and this is forecast to continue. The proposed development at Clarence Place will therefore provide for this growing demand, within a central and accessible city centre location.

Design

- 3.12 The design of the application proposal has evolved through discussions with NCC as part of the pre-application process.
- 3.13 The significance of the listed building relates primarily to its contribution to the associated group of buildings along Clarence Place. In this context, and in light of the dilapidated state of the building, the importance of retaining the frontage has been the primary focus. In response to pre-application discussion with officers, the proposal has sought to ensure additional restoration of the building beyond frontage retention, including the retention of the original 3 dimensional structure of the historic building. This maximises the extent of the restoration of the historic fabric and original plan form of the building, which will remain legible post development.
- 3.14 The new build element will have minimal impact on the frontage and restored 3 dimensional structure, as it will be set behind the existing stone balustrade. Views of the mansard roof and the proposed building extension from Clarence Place will be limited. The prominence of the existing façade and its positive contribution to the listed terrace of buildings will be both retained and enhanced.
- 3.15 Full details regarding the evolution of the scheme and the design concept are provided within the accompanying Design and Access Statement provided by Base Associates.

4. Planning Policy Context

4.1 Legislation required that planning and listed building consent applications are determined in accordance with the development plan, unless material considerations indicate otherwise.

4.2 This section summarises the relevant planning policy context and relevant material considerations.

The Development Plan

Newport Local Development Plan 2011-2026

4.3 The Newport Local Development Plan (LDP) was adopted January 2015 and provides the statutory development plan for the Authority.

4.4 Within the LDP, the site is located within the urban settlement boundary, within the Clarence Place Local Centre and is designated as one of six City Centre Districts which form priority areas and a focus for redevelopment in the City Centre.

4.5 **Objective 1 (Sustainable Use of Land)** stipulates that all development should make the most efficient use of natural resources by seeking to locate development in the most sustainable locations, minimising the impact on the environment and making a positive contribution to local communities. The policy further notes that the Plan will seek to meet this objective by focussing development on brownfield sites.

4.6 **Objective 2 (Climate Change)** ensures that development and land uses in Newport make a positive contribution to minimising, adapting to or mitigating against the causes and impacts of climate change. The Policy further stipulates that the Plan seeks to minimise the need to travel to reduce Newport's output of greenhouse gases.

4.7 **Objective 3 (Economic Growth)** aims to enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region.

4.8 **Objective 5 (Conservation of the Built Environment)** ensures that all development or use of land does adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment. The objective therefore seeks to preserve historical quality and to ensure that new development is carefully designed.

4.9 **Objective 8 (Culture and Accessibility)** stipulates that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals.

4.10 In addition to the Plan Objectives listed above, the Local Plan also includes Strategic Policies and General Development Principles, as set out below.

4.11 **SP1 (Sustainability)** requires proposals to make a positive contribution to sustainable development by concentrating on brownfield land within the settlement boundary. They will be assessed as to their potential contribution to the efficient use of land and

the reuse of previously developed land and empty properties in preference to Greenfield sites, in addition to other potentially relevant factors.

- 4.12 **SP3 (Flood Risk)** stipulates that Newport's coastal and riverside location necessitates that development be directed away from areas where flood risk is identified as a constraint and ensure that the risk of flooding is not increased elsewhere. Where appropriate, a detailed technical assessment will be required to ensure that the development is designed to cope with the threat and consequences of flooding over its lifetime.
- 4.13 **SP9 (Consequences of the Natural, Historic and Built Environment)** states that the conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals.
- 4.14 **SP18 (Urban Regeneration)** favours proposals 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 and the reuse of vacant, underutilised or derelict land. The policy also states that there may be a wide range of ecological value on brownfield sites that have been vacant for some time. Intensive survey requirements will be essential in such instances.
- 4.15 **GP1 (Climate Change)** requires proposals to be designed to:
- Withstand the predicted changes in the local climate and to reduce the risk of flooding on site and elsewhere by demonstrating that the risks and consequences of flooding can be acceptably managed, including avoiding the use of impermeable hard surfaces;
 - Minimise energy requirements and incorporate appropriate renewable low or zero carbon energy sources, including on site energy provision where practicable;
 - Reuse or recycle existing construction materials present on the site.
- 4.16 **GP2 (General Amenity)** stipulates that development will be permitted where:
- There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality;
 - The proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area;
 - The proposal seeks to design out the opportunity for crime and anti-social behaviour;
 - The proposal promotes inclusive design both for the built development and access within and around the development;
 - Adequate amenity space for future occupiers.

4.17 **GP4 (Highways and Accessibility)** states that development proposals should:

- Provide appropriate access for pedestrians, cyclists and public transport in accordance with national guidance;
- Be accessible by a choice of means of transport;
- Be designed to avoid or reduce transport severance, noise and air pollution;
- Make adequate provision for car parking and cycle storage;
- Provide suitable and safe access arrangements;
- Design and build new roads within private development in accordance with the highway authority's design guide and relevant national guidance;
- Ensure that development would not be detrimental to highway or pedestrian safety or result in traffic generation exceeding the capacity of the highway network.

4.18 The policy further notes that that development must be of a scale that the adjacent road network has the capacity to serve, without detriment to the highway network or the environmental characteristics of the road.

4.19 **GP6 (Quality of Design)** stipulates that good quality design will be sought in all forms of development. The aim is to create a safe, accessible, attractive and convenient environment. The following fundamental design principles should be addressed in all development proposals:

- All development should be sensitive to the unique qualities of the site and respond positively to the character of the area;
- All development should maintain a high level of pedestrian access, connectivity and laid out so as to minimise noise pollution;
- Where possible, development should reflect the character of the locality but avoid the inappropriate replication of neighbouring architectural styles;
- New development should appropriately reflect the scale of adjacent townscape. Care should be taken to avoid over-scaled development;
- High quality, durable and preferably renewable materials should be used to complement the site context. Detailing should be incorporated as an integral part of the design at an early stage;
- New development should be inherently robust, energy and water efficient, flood resilient and adaptable, thereby facilitating the flexible re-use of the building. Where existing buildings are present, imaginative and sensitive solutions should be sought to achieve the re-use of buildings.

- 4.20 **GP7 (Environmental Protection and Public Health)** states that development will not be permitted which would cause or result in unacceptable harm to health because of land contamination, dust, instability or subsidence, air, heat, noise or light pollution, flooding, water pollution, or any other identified risk to environment, local amenity or public health and safety.
- 4.21 **T4 (Parking)** requires developments to provide appropriate levels of parking, within defined parking zones, in accordance with adopted parking standards.
- 4.22 **R1 (City Centre Schemes)** stipulates that redevelopment schemes or other proposals to enhance the provision of retail facilities within the city centre shopping area will be favoured provided that the scale, design and layout of the proposals are compatible with the overall functioning of the city centre, its architectural character and visual environment.
- 4.23 **CF8 (Tourism)** states that new and improved tourism related developments, including hotel and other visitor accommodation, conference and exhibition facilities, heritage interpretation facilities, rural tourism and activity tourism in the countryside will be permitted, particularly where regeneration objectives will be complemented.
- 4.24 **W3 (Provision for Waste Management Facilities in Development)** states that where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste.

Material Considerations

Planning Policy Wales (Edition 9, November 2016)

- 4.25 Planning Policy Wales ('PPW') sets out the main land use planning policies of the Welsh Government against which development proposals should be assessed.
- 4.26 **Paragraph 4.2.1** states that the planning system is necessary and central to achieving the sustainable development of Wales. The planning system therefore provides for "*a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker...in taking decisions on individual planning applications*".
- 4.27 **Paragraph 4.9.1** notes that previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites.
- 4.28 **Section 4.11** seeks to ensure sustainable development through good design.
- 4.29 **Section 6.1** sets out the Welsh Government's Objectives to preserve or enhance the historic environment, ensure the protection or enhancement of conservation areas and ensure that the character of historic buildings is safeguarded from works that would compromise their special architectural and historic interest. **Paragraph 6.2.1** sets out the objective to safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved.
- 4.30 **Paragraph 6.5.11** states that there is a strong presumption towards the preservation of listed buildings and their setting. Developments that conflict with this should aim to

find the best way to retain special qualities of the listed buildings in a sustainable use. Where development is necessary to preserve listed buildings, reinstating the original uses should be the first option, if appropriate. If not, planning controls should recognise the need for flexibility where new uses are considered in order to secure the future of the listed building.

- 4.31 **Paragraph 6.5.11** states the primary material consideration for any development proposal affecting a listed building, is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses. PPW seeks to protect and enhance the special qualities of listed buildings, while retaining them in sustainable use.
- 4.32 **Chapter 7** relates to Economic Development. **Paragraph 7.1.1** recognises that economic land uses include the traditional employment land uses, but also uses such as retail, tourism and public services.
- 4.33 **Paragraph 11.1.1** notes that tourism is vital to economic prosperity and job creation in many parts of Wales. **Paragraph 11.1.4** goes on to say that the planning system should encourage sustainable tourism in ways which enable it to contribute to economic development and conservation.

Supplementary Planning Guidance – Parking Standards (2015)

- 4.34 The site is located within Parking Zone 2, within the City Centre Fringe. The City Centre Fringe is described as being within the centre of towns which local people regard as their destination for most activity which is not met within their own local community or an area within the City Centre (Parking Zone 1). The built density of the city centre fringe is high with little private car parking. There are significant parking restrictions and substantial amounts of off-street parking available to the public (Paragraph 5.2).

Policy Overview

- 4.35 To summarise, a number of key policy themes emerge as being relevant to the proposed development. These are as follows:
- Achieving sustainable developments which ensure the beneficial reuse of brownfield sites and protect the vitality of existing centres. PPW confirms that sustainability is the guiding principle which should influence the planning process.
 - Proposals which assist with the regeneration of the urban area, particularly where they contribute to the vitality, viability and quality of the environment of the city centre and the reuse of vacant, underutilised or derelict land are supported.
 - Newport's heritage assets should be protected and enhanced where possible.
 - Design quality is an integral part of the planning process. Planning policies at all levels promote high quality inclusive design in the layout of new developments and individual buildings in terms of function, accessibility and impact to achieve and deliver sustainable development.

- New proposals should encourage the use of sustainable transport options and accessibility for all.
- Hotel uses are supported in principle through the Development Plan, particularly where regeneration objectives will be complemented.

4.36 In light of the above, we consider that, in principle, an application for the redevelopment of the site to provide a new purpose built hotel (Class C1) with ancillary commercial units along with the retention and restoration of the listed façade is compliant with planning policy at all levels. The following sections sets out a detailed analysis of the proposed development in this policy context.

5. Planning Analysis

Principle of Development

- 5.1 The site is located within the Clarence Place Local Centre. It is designated under Policy R1 as one of six City Centre Districts. The area is an identified priority area and a focus for redevelopment and regeneration in the city centre, as set out in the Newport City Centre Masterplan.
- 5.2 The recent consultation of Newport City Centre Masterplan (2018), which closed in March 2018, confirms that the site is located within Area III: Riverside. In this area, the rejuvenation and reactivation of Clarence Place is a key project. It is apparent that the regeneration of Clarence Place is a key priority for the city.
- 5.3 Clarence Place is currently an underperforming centre, with a number of vacancies (including the application site). As acknowledged within the LDP and Newport City Masterplan that the centre is in significant need of investment and regeneration. Policy SP18 of the Newport LDP gives support to proposals which assist in the regeneration of the urban area.
- 5.4 The proposal will deliver significant investment in the local centre, which will kick-start the regeneration of the area. The proposal will result in the redevelopment of this currently vacant and derelict building at a prominent gateway location into the city centre. It will result in a significant improvement to the quality of the local environment. Furthermore, the proposed use of the site as a hotel above two ground floor commercial units will have a positive impact on the vitality and viability of the centre. It will attract footfall and new business to the area. The proposal clearly complies with the aims and objectives of Policy SP18.
- 5.5 Policy CF8 gives support for developments providing hotel accommodation, particularly where regeneration objectives will be complemented. This is the case with the proposed development. Moreover, the site is located within walking distance to the city centre, which is a sustainable and accessible location to provide visitor accommodation.
- 5.6 The application proposal represents a significant investment in the area. The proposal will secure the long-term beneficial use of the application site. It will preserve and refurbish the Listed Building's façade. In turn, it will deliver a range of positive benefits to the local area.
- 5.7 In principle, it is evident from the above analysis that, in principle, the proposal is supported by prevailing development plan policy. The direct and indirect economic and social benefits of the scheme will make a positive contribution to the Newport economy. The proposal will create new job opportunities and associated spin-off benefits from spend associated with the hotel guests. In principle, these benefits of the scheme are the basis on which the proposal was supported by officers during the pre-application consultation stage. They remain valid and weigh in favour of granting planning permission for the development.

Heritage

5.8 The Heritage Impact Assessment (October 2018) submitted in support of the application complies with current Cadw (2017) guidance in assessing the nature and magnitude of any impacts caused by the development in relation to the listed buildings within the site and its surrounding context.

5.9 The assessment concludes that the proposal is acceptable in that it:

- Will result in a small degree of harm to aspects of the building(s) which make a relatively low contribution to the heritage significance of the asset, including:
 - The loss of original historic fabric from the rear range of the listed building.
 - The removal of original features, fittings and internal partitions from the first and second floors of the buildings.
 - The replacement of the existing pitched and gabled roof structure with a wholly new mansard roof structure.
 - From changes to the buildings' setting as a result of the new range being added to the rear.
- This harm must be seen in the context of the listed buildings that have been deteriorating for a prolonged period of time. Moreover, this prolonged deterioration has followed a phase where the internal spaces of the ground floor were largely gutted and joined together. Having been abandoned and left derelict, the buildings have suffered water ingress and infestation by pigeons that have created significant damage. When combined, this context represents an ongoing and permanent loss of significance at the heritage asset. Moreover, this loss is likely to continue in an unbridled manner for the foreseeable future without restoration through the proposed development.
- Any small degree of harm is off-set by the positive and enhancing impacts of the development in heritage terms. In particular:

Bringing about direct physical enhancements to the condition and appearance of those aspects of the building(s) which make the biggest contribution in terms of heritage significance, including:

 - The architectural finishes of the main Clarence Place elevation, which will be conserve and repaired to a specification agreed with the Council prior to commencement.
 - The improvement of the ground floor, where the existing late 20th century fenestration would be replaced to afford the buildings a high quality appearance in keeping with the original design intention.

- Improvement to the setting of the adjacent buildings brought about by the Clarence Place streetscape because of the restoration and delivery of an active and attractive frontage at 14-18 (in place of a derelict night club).

On balance, it is considered that the proposal complies with prevailing development plan policy in relation to heritage matters.

Design

- 5.10 Detailed analysis regarding the application proposal's layout, scale and design justification is set out within the supporting Design and Access Statement, prepared by Base Associates. The Design and Access Statement explains the process of site analysis and contextual appraisal undertaken in formulating the development proposal. It illustrates how the design principles of the site's surroundings and its broader context within the wider townscape, have all informed the massing and design of the proposed development.
- 5.11 The final design has been informed by this detailed analysis and evaluation of the site context and through pre-application dialogue with officers. The proposed development seeks to respond positively to this context. The key consideration in the formulation of the scheme has been ensuring the retention of the listed façade and restoration of the 3 dimensional profile of the original building. This is considered vital to protect and enhance the special architectural and historic interest of the designated heritage asset and its contribution to the streetscape along Clarence Place.
- 5.12 The front façade and as much as possible of the historic fabric behind will be retained and carefully restored. The proposals will retain, in plan form, the layout of the listed buildings. The existing structure will be retained, ensuring that the layout of the listed buildings will still be legible after the redevelopment of the site. This will ensure that the integrity of the building(s) is retained. The works will utilise appropriate materials and techniques and enhance the building's declining condition. These works will be developed in dialogue with Cadw and the Council.
- 5.13 The existing slate roof is dilapidated. It is proposed to be replaced by a set-back mansard roof element, which will sit behind the existing stone balustrade. The roof element will be clad in grey slate roof tiles with four minimal dormer window openings which have been carefully centralised with the existing window alignment. The simple approach, clean lines and use of a straightforward palette of consistent materials is considered entirely consistent with the site interests and context, and is appropriate.
- 5.14 To the rear, a new extension will be provided which will replace the existing single storey addition. In response to pre-application dialogue, the extension will be set back at floors two and three, in order to ensure an appropriate relationship with the properties to the rear. Furthermore, the materials at the upper floors have been changed to slate tiles, with brickwork provided on the lower floors, in order to soften the overall mass of the building. This approach increases the level of articulation and visual interest in the elevation, its quality and complementary relationship with the original building.

- 5.15 Overall, it is considered that the design of the proposal is appropriate. It ensures that a viable development scheme is provided. The design is straightforward, deliverable and will bring forward the redevelopment of the site. In doing so, it will secure a positive contribution to the site and its surrounding context.

Residential Amenity

- 5.16 It should be noted at the outset that the existing building is in a very bad state of repair. It currently has a detrimental impact on the outlook and amenity of neighbouring occupiers. The site is located within a city centre location, with residential properties located to the rear on St Vincent Road.
- 5.17 In response to dialogue at the pre-application stage, a number of amendments have been made to the design in order to ensure that the proposals have a sensitive and appropriate relationship with adjacent properties.
- 5.18 In particular, there are no windows located in the rear elevation which will ensure that there is no direct overlooking from the new extension. Windows located at upper floors will be located on the eastern and western boundaries only, and will be splayed, providing oblique views only. This further limits any potential views from / to the site.
- 5.19 As outlined above, the second and third floors will be stepped back approximately 6metres from the rear of the building. This approach increases the distance between the upper storeys and the properties on St Vincent Road. In doing so, it will respect the outlook from these buildings and avoid any unacceptable overbearing impact upon them. A green ivy screen is proposed to be provided along the rear wall. When combined, these design initiatives will enhance the outlook and amenity of the site when viewed from the rear of the properties on St Vincent Road.
- 5.20 Overall therefore, it is considered that the proposal will result in a significant enhancement to the local environment. It will improve the amenity of the site, and will have an appropriate and sensitive relationship with adjacent residential dwellings.

Noise

- 5.21 Ion Acoustics have prepared a Noise Assessment for the proposed development, and their report accompanies this application. This confirms that the front is affected by road traffic noise from Clarence Place. Suitable glazing to limit internal noise levels to appropriate levels has been determined. Mechanical ventilation is also recommended to the rooms facing Clarence Place. Both means of mitigation can be readily incorporated into the proposed development.
- 5.22 Noise levels at the rear are much quieter such that there are no implications for hotel bedrooms. A noise limit for any plant has been set at 5dB below the typical background noise levels.
- 5.23 In response to pre-application consultation from officers at the Council, a noise insulation scheme has been provided to ensure that noise levels from the commercial units are controlled to adjacent residential properties. This will ensure no unacceptable adverse impacts on future visitors to the hotel.

- 5.24 Having regard to the above, it is considered that the proposal is acceptable and policy compliant from a noise perspective.

Highways

- 5.25 A Transport Statement has been prepared by Transport Planning Practice. The report confirms that site is located in an area with good access to public transport services, being within a short walk of Newport Station and bus stops providing access to 21 bus routes. It is also in close proximity to Newport City Centre, with easy access to a wide range of amenities as well as employment uses. The high level of access to public transport services, as well as car-free nature of the hotel is likely to deter visitors who would choose to drive.
- 5.26 In any event, the report confirms that there are local public car parks in close proximity of the site. The public car parks have capacity to absorb any over-spill parking generated from the development. Furthermore, the proposed land use will result in a reduction in the level of car parking provision required when compared to the previous use of the site as a nightclub.
- 5.27 The trip generation assessment undertaken shows that the proposal is expected to result in a small increase in the number of trips during the peak hours. The majority of these trips are expected to be via sustainable modes of transport given the car-free nature of the hotel the sites accessible location. The level of trips generated by development is therefore expected to have a negligible impact on the local highway and transport networks during both weekday AM and PM peak periods.
- 5.28 In summary, it is considered that the proposals are acceptable in terms of highways, particularly in view of the site's sustainable and accessible location.

Ecology

- 5.29 A Bat Survey Report has been prepared by The Environmental Dimension Partnership Ltd, and accompanies this application. The report confirms that detailed bat emergence/re-entry surveys were undertaken. No bat emergence or re-entry was confirmed during the surveys carried out in August 2018. The building(s) have low potential to support roosting bats.
- 5.30 Bat enhancement measures including :
- Tool box talks for on-site contractors prior to the commencement of development.
 - All works to be carried out with care and vigilance for bats to adhere set procedures in the unlikely event a bat and/or its roots are found during demolition and construction works.
- 5.31 The report confirms that the proposals are acceptable, subject to adherence to the recommended mitigation measures. The application would be pleased to agree to a reasonably worded planning condition requiring the implementation of the mitigation, if required. On this basis, the proposal is acceptable from an ecology perspective.

Flood Risk

- 5.32 A Flood Consequence Assessment has been prepared by RSK. As confirmed within the Development Advice Maps, the site is located within Flood Zone C1 (area of the floodplain which are developed and served by significant infrastructure, including flood defences). The site consists of impermeable ground and there will be no change to the extent of permeability as result of the development.
- 5.33 The report confirms that the proposal meets the justification test in Technical Advice Note 15 (Flood Risk). Moreover, the FCA finds that:
- A small section of the site lies in the 1 in 200 year flood risk area, with marginal depths up to 80mm possible on site.
 - Flood risk from groundwater, sewers, reservoirs and artificial sources is demonstrated to be low.
 - The development will have minimal to no impact on other forms of flooding.
 - Where possible, finished floor levels should be set at 7.88m AOD, albeit this may not be practicable as the scheme is a refurbishment.
 - It is acceptable that surface water run-off from the development will be managed in a similar way to the existing development.
- 5.34 The FCA confirms that the proposed development is justifiable and acceptable in flood risk terms, taking into account of prevailing development plan policy and relevant material considerations.

Summary

- 5.35 In summary, and on the basis of the foregoing analysis, it is demonstrated that the proposal constitutes positive sustainable development. It will deliver significant regeneration in an area identified as being a priority for such development. The positive mix of ground floor commercial and hotel use on upper floors will contribute positively to the vitality and viability of a local centre. This is particularly the case when considered in light of the long-term vacant and dilapidated nature of the site. The balance of demolition, restoration of historic fabric and sympathetic redevelopment is entirely appropriate in this location. The design is of high quality. The proposed approach to transport and parking is acceptable in this sustainable location. The balance of other environmental considerations weight in favour of granting planning permission and listed building consent for the proposal.

6. Conclusion

- 6.1 This Planning Statement is submitted by Turley on behalf of 45 Croydon Way Limited, in support of a full planning and listed building consent application for the partial demolition, restoration, extension and redevelopment of the 14-18 Clarence Place to provide a 58-bed easyHotel and ancillary commercial units. It should be read in conjunction with the Design and Access Statement and other documents and drawings submitted in support of this application.
- 6.2 The application is submitted following an extensive period of pre-application consultation, both with officers, statutory consultees and the public. The consultation has been carried out in line with legislation and current best practice. The feedback received has informed the evolution of the detailed design of the scheme from the outset.
- 6.3 In line with the agreed position reached with officers at the outset, it is evident that the application site is a sustainable and suitable location for the proposed mixed use development. It is located in a designated local centre and priority area for regeneration. The mixed commercial and hotel use is entirely suitable in this location. The uses will contribute positively to the attraction, vitality and viability of the local centre. In turn, they will positively transform an important gateway location into the city centre.
- 6.4 On the basis of the foregoing analysis, it has been demonstrated that the application proposal will deliver a number of major benefits, including the following:
- The positive redevelopment and efficient re-use of a vacant and dilapidated previously developed site.
 - Arresting the ongoing loss of significance at an important Grade II Listed Building and designated heritage asset at a key gateway location in the site.
 - The part demolition and restoration of a currently dilapidated Grade II Listed Building, including the preservation and enhancement of the key features contributing to the significance of the asset.
 - The provision of new, high quality and affordable hotel accommodation in the heart of the city.
 - The erection of a high quality, contemporary and well-designed building extension that improves the contribution of the site to the amenity of the area.
 - Major employment/economic benefits in terms of construction and hospitality jobs, including up to 16 full time equivalent new jobs.
- 6.5 This Planning Statement and the wider application demonstrate that the proposed development can be readily accommodated on the application site and is fully acceptable in principle. Whilst there may be considered to be some minor impacts in regards to design, parking and heritage, it is considered that, on balance, the scheme is acceptable due to the significant positive impacts that the proposal will deliver. This

includes the significant investment to redevelop the site, along with the preservation and restoration of the Listed Buildings at 14-18 Clarence Place, which will ensure that the significance of the wider group of buildings is retained. Furthermore, the proposals will lead to job creation and will assist in the regeneration of the wider Clarence Place District Centre.

- 6.6 The application is compliant with national and local policy. The balance of material considerations weigh in favour of the scheme. Therefore, it is concluded that there is a compelling case in favour of this important and clearly beneficial development. Planning permission and listed building consent should be granted on this basis.

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Appendix 1: Pre-Application Response

Ask for/Gofynnwch am Joanne Davidson

Regeneration Investment and Housing

Our Ref/Ein Cyf P/18/00077

Ad fywio, Buddsoddi a Thai

Your Ref/Eich Cyf

Tel/Ffôn 01633 656656

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E-Mail/E-Bost planning@newport.gov.uk

Civic Centre/Canolfan Ddinesig
Newport/Casnewydd
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NP20 4UR



Owen Francis
Owen.francis@turley.co.uk

BY EMAIL

20 June 2018

Dear Mr Francis

PROPOSAL: PRE APPLICATION PLANNING ENQUIRY FOR PROPOSED CHANGE OF USE TO C1 (HOTEL) WITH 2NO. GROUND FLOOR COMMERCIAL UNITS, PARTIAL DEMOLITION OF LISTED BUILDING, PROPOSED 4 STOREY REAR EXTENSION AND REFURBISHMENT/RENOVATION OF FRONT ELEVATION

SITE: Land and buildings encompassing 14 to 18 Clarence Place

REF NUMBER: P/18/00077

I refer to your recent request for pre-application advice in respect of the above. In formulating this response I have had regard to comments obtained from the parties listed below:

- Planning Policy Manager;
- Head of Streetscene and City Services (Ecology Officer);
- Head of Streetscene and City Services (Highways Officer);
- Head of Law and Regulation (Environmental Health Officer);
- Conservation Officer;
- Team Manager Regeneration.

We held a pre-application meeting on 15th May 2018 to discuss your client's proposals.

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice any formal decision of the Council in respect of any application, on which a more extensive consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to officers.

Relevant Site History

03/1197. Change of use of the rear of no. 12 to provide extension to adjoining nightclub (I have referred to these plans in calculating fallback floorspace at ground floor level for parking assessment purposes and the height of the rear extension).

Site Constraints / Designations

The site is located within the urban settlement boundary in accordance with the adopted Newport Local Development Plan.

The site is within flood risk zone C1 for the purposes of Technical Advice Note 15.

It is a grade II listed building.

It is within the Clarence Place Local Centre.

The site is affected by the Chepstow Road Air Quality Management Area.

Relevant Policy Context and material considerations

National Planning Policy

Planning Policy Wales (PPW) (Ed 9 – November 2016) provides the overarching policy framework for planning in Wales.

Chapter 6 relates to the historic environment and sets out the objectives to protect, manage and conserve the historic environment, notably to safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved.

Chapter 7 relates to economic development and the need to promote the re-use of previously developed, vacant and underused land and to deliver physical regeneration and employment opportunities to disadvantaged communities.

Chapter 11 relates to tourism, sport and recreation. It states that the planning system should encourage sustainable tourism in ways which enable it to contribute to economic development, conservation, urban regeneration and social inclusion.

Technical Advice Notes

A number of TANs are relevant to the consideration of this scheme:

- TAN 12: Design (2016)
- TAN 23: Economic Development (2014)
- TAN 13: Tourism (1997)
- TAN 15: Development and flood risk (2004)
- TAN 24: The Historic Environment (2017)

Local Planning Policy

Adopted Local Development Plan

The following LDP policies are considered to be relevant:

- SP1 – Sustainability
- SP3 - Flood Risk
- SP9 – Conservation of the Natural, Historic and Build Environment

- SP18 – Urban Regeneration
- GP1 – Climate Change
- GP2 – General amenity
- GP4 – Highways and Accessibility
- GP6 – Quality of Design
- GP7 – Environmental Protection and Public Health
- T4 – Parking
- R1 – City centre schemes
- CF8 – Tourism
- W3 – Provision for Waste management facilities in development

Adopted Supplementary Planning Guidance

- Air Quality SPG – February 2018
- Parking Standards SPG – August 2015

DEVELOPMENT CONSIDERATIONS

Principle of Development

Whilst outside the designated city centre shopping area, Policy R1 – City Centre Schemes, in its supporting text, notes Clarence Place as one of six priority areas and a focus for redevelopment to support the regeneration of the City Centre as set out in the Review and Refresh of the Newport 2020 Masterplan. More recently, the consultation document City Centre Masterplan (2018) notes Clarence Place as a specific project area aiming to rejuvenate the locality. Policies SP18 and CF8 of the adopted Local Development Plan provide policy support for regeneration and tourism schemes in this locality and the potential regeneration benefits associated with the scheme are considered to be a material consideration capable of being afforded significant weight. The proposed mix of hotel and 2 commercial units is, in principle, acceptable in this location.

The site is located within flood risk zone C1. The proposal would meet the justification test set out in the Technical Advice Note 15 and therefore a flood consequences assessment will be required to support the application and to assess the manageability of a flood event against the acceptability criteria set out in the TAN.

The site is located within Parking Zone 2 – city centre fringe. No parking is proposed or can be provided. The existing lawful use has no parking.

The buildings are listed grade 2 and are in very poor state of repair. They are subject to current Enforcement Notices that have required prosecution proceedings. Further prosecution for failure to comply with the Enforcement Notices is pending.

The design, scaling and massing of the proposed development will need to be respectful of the Grade II listing.

The site backs onto the rear of residential properties along St Vincent Road and adjoins residential properties along Clarence Place. The design, scale and massing of the development will need to be respectful of residential amenity.

Officer Assessment

Supporting Information

In support of your pre-application advice request you submitted the following information:

- Pre application Design Brochure revision 02.

Please note that comments from external consultees (that will either be statutory or non-statutory consultees as part of the planning application and listed building consent process) are not sought as part of this pre-application advisory process.

Background

At our meeting I hope that the Council expressed the pragmatic approach it was willing to take in relation to a viable re-use of this derelict listed building. It is noted that the building is in a very poor condition and its continued decline is inevitable unless a future use is found for the building. Whilst the building occupies a favourable position in close proximity to the city centre and strategic transport hubs it is expected that it will require significant investment to rectify and reverse the dereliction and associated damage to the building and that some compromises may be required if a scheme of appropriate quality and a viable re-use are to be secured in practice. I have already expressed reservations about the scale and massing of the proposed 4 storey extension in relation to its impact upon the residential amenities of occupiers at St Vincent Road and notably overbearing effect and the potential for this, in my view, to be a significant objection. This has resulted in the submission of a revised Design Brochure for consideration. It is on the basis of this revised brochure that I base the following assessment.

Planning Policy

I have outlined relevant policies in the section above and further discussed relevant matters to consider in connection with these policies. As you know, Newport benefits from an up to date, adopted Development Plan and consequently it will make a decision on any application in accordance with the Development Plan unless material considerations indicate otherwise.

Key issues

In my opinion, key issues for consideration will be the impact of the proposals upon the special character of the listed building; the impact upon the regeneration, appearance and vitality of Clarence Place Local Centre; the impact of development on parking and highway safety; flood risk consequences and management; the impact of the proposed extensions on residential amenity including adjoining neighbours and those at St Vincent Road.

Impact upon the Special Character of the Listed Building

This pre-application enquiry relates to a grade II listed C20 commercial property. Its primary reason for listing is its integral part of an early C20 commercial development, attached to and for group value with the Technical Institute on one side and Nos 20-34 Clarence Place on the other.

The building is considered to be in need of investment due to its derelict status and further risk of decay. The proposal is therefore welcomed in principle as a potential solution to the problem of an at risk property.

It is understood that a lot of damage has been inflicted on the building over the years and the character, specifically internally, has been compromised. A future application will need to undertake an assessment of the heritage significance of the entire site and make clear what elements of significance can be retained, repaired and reinstated.

The proposed development will see a commercial use put back into what was originally a commercial building, which is welcomed. The three units at the ground floor will be able to enhance the current situation and provide active shopfronts in a sensitively designed manner. The primary elevation is significant and has a strong presence in the streetscene particularly because of its group merit with its neighbouring properties. The proposal does not impact on the synergy between these properties but improves its standing within the row. This is a real opportunity to bring back much of the historic character to the front elevation and make a positive impact to this neglected site.

Internally we will require a survey of the space to allow us to understand how the proposed plans work with the historic layout. Where there is evidence of existing fabric such as lath and plaster ceilings these would be expected to be repaired or reinstated. Within the historic part of the listed building traditional methods and materials would be required to ensure that the building does not face future problems from inappropriate modern insertions. In particular, the link between the modern extension and historic building would be of particular interest to ensure issue such as movement or condensation is dealt with efficiently. The loss of fabric must be justified and kept to a minimum which is clearly understood by the proposal of one opening on each level between the modern and the existing property. Where openings are to be lost then evidence of their location and their reuse in the future scheme would be preferable.

The loss of the dilapidated one storey extension to the rear of the property should be clearly justified but it is understood to be of modern construction with limited significance. The proposed extension is large but remains below the roof line and its reduced mass from the original proposal is welcomed. High quality design is required of any extension to a listed building. The use of brick is supported however not a requirement as the block should be read as a modern element.

Overall the proposal to bring the building back into sustainable use and associated refurbishment and alterations are welcomed and are a merit of the proposal capable of being afforded significant weight in future decision making. The fine detailing will however be critical to the future acceptability of the scheme and the quality of supporting information will need to accord with both adopted local policy and national planning policy with associated technical guidance. A Heritage Impact Assessment and method statement for demolition works will be expected as a minimum. A detailed schedule of repair works will be necessary along with scaled joinery plans, materials schedule, specifications for stone work and roof works, etc. Additional information in relation to new shopfront design and signage will also be essential, particularly where original fabric is to be removed at street level. We would be happy to agree a full list with you in due course.

Impact upon the Regeneration, Appearance and Vitality of Clarence Place Local Centre

The proposal will bring a derelict building back into use in a prominent location on a primary thoroughfare close to the city centre. This has merit and is welcomed. It will attract pedestrian activity that will enhance the vibrancy of the local centre and facilitate works to the building intended to enhance its visual appearance and halt its continued decay.

Clarence Place has been highlighted as an area of improvement in our City Centre masterplan Proposals, and the economic rationale for increased mid-range hotel accommodation close to the city centre but enjoying good links to the new convention centre accords with the City Council's strategic requirements.

The impact of vehicle travel to the new hotel will need to be demonstrably mitigated in what is already a congested area, particularly when sports events are underway at Rodney Parade. Information relating to the operator's management of the site and parking and access expectations, ideally based upon experience of comparable sites would be beneficial and may help to offset objections relating to lack of parking and possible congestion.

Overall, the redevelopment proposal has the potential to provide significant regeneration and economic benefit to the city centre and local centre.

The Impact upon Parking and Highway Safety

The property is located in zone 2 (city centre fringe) of the Council's adopted parking standards. The off street parking requirement for a hotel in zone 2 is 1 space per bedroom, 1 space per 3 non resident staff and 1 commercial vehicle space. Loading and unloading is acceptable outside the property but the car parking requirement is not met as no off road parking is or can be provided. The Head of Streetscene and City Services would therefore object to a future application on this basis.

I have reviewed the adopted parking SPG and note that the parking requirements for a licensed club are 1 space per 3 non resident staff and 1 space per 5 sqm of public area including servery. The staff requirement ratio for the hotel is therefore the same as the lawful club use. In fact, the demand for staff parking may be less with the proposed use but dependent upon the operational requirements of the future users of both the hotel and commercial units.

In terms of public area for the lawful club use, a 2004 floor plan shows a ground floor public space to approximately 400 sqm and would equate to a demand for 80 spaces based upon the 1 space per 5 sqm. A 58 bedroom hotel would generate a demand for 58 spaces along with those required for staff and commercial parking that I have already mentioned is the same as the club. Consequently, I am of the view that the plans proposed could demonstrate a reduction in parking demand compared to the fallback position in addition to any potential reduction that may also be achieved by way of a sustainability test in accordance with the SPG.

Flood Risk Consequences and Management

The site is located within flood risk zone C1 and I am of the view that the proposal would meet the justification tests set out in TAN 15. However, a future application will need to be accompanied by a Flood Consequences Assessment that has regard to the acceptability criteria set out in the TAN. This will be subject to statutory consultation with Natural Resources Wales. It is possible that the proposal will not comply with all acceptability criteria and this may raise an objection on flood risk grounds. However, any such objection will be weighed against other material considerations such as those outlined elsewhere in this assessment and the fall back position presented by the lawful use.

The Impact of the Proposed Extensions on Residential Amenity

This has been a key concern for me as you know. I understand the need to extend the building arises from a realistic analysis of viable future uses for the site and the ability to extend and adapt the building is essential to securing such uses. At present, you have confirmed that there is interest from a specific hotel operator that requires a minimum number of rooms to ensure scheme viability in the long term. An inability to extend and adapt would likely make the building unsuitable for hotel use and other uses assessed by you to date have not apparently proven viable. I am not a commercial specialist and I have accepted this at face value. In any event, a hotel use in this location would be welcomed and having regard to site context would be a suitable use for the building in principle. In fact, it would likely be beneficial to the local environment not just in terms of enhancement to streetscape but also in terms of vitality and viability generally.

The building is adjoined by mixed use premises including residential. My colleagues in Environmental Health have commented on the pre app with the following assumptions:

The reply is made on the understanding that the applicant intends to run a commercial hotel for stays of short duration, commonly 1-7 days, and the accommodation will not be used as a hostel, HMO or hall of residence and is not envisaged as being used as permanent or main residence. The hotel will be unmanned and food will not be offered or prepared. The ground floor will be used for unspecified commercial activity.

The above is also my understanding of the proposal.

They have advised that any future application will need to be accompanied by additional noise related information as follows:

A full noise assessment is needed prior to permission being granted in order to demonstrate that the site is suitable for the intended use and that any existing neighbouring residential properties will not be adversely affected by noise from the proposed development.

A noise assessment on the potential for noise from the proposed development (commercial/industrial activities) to affect the existing residential properties must be undertaken and submitted to and approved in writing by the local planning authority prior to permission being granted. The noise assessment must show that noise emitting from the proposed commercial/industrial activities, calculated in accordance with BS4142 2014, does not adversely affect the residential premises in the vicinity.

The assessment will need to demonstrate that noise emitted from the proposed development (commercial/industrial activities) including any plant and equipment located at the site shall be controlled such that the rating level, calculated in accordance with BS4142 2014, does not exceed a level of **5dB below** the existing background level, with no tonal element to the plant.

A scheme of sound insulation works to the ceiling, floor and party wall structure between the proposed commercial premises and any adjoining residential property shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to first beneficial use and shall be retained thereafter in perpetuity.

Unless otherwise stated, some of this information could be secured by planning condition, however having regard to the works likely to be proposed and timescales, I would welcome such information up front and pre-determination where possible.

In relation to design and massing, my initial concerns centred upon the impact of the rear 4 storey extension on St Vincent Road properties in particular. I also referred to existing windows in the adjoining premises that appear to overlook the existing single storey rear extension. I cannot determine at this stage what rooms or areas these windows serve. If they are hallway or staircase windows they will raise little concern. If they serve habitable spaces such as bedrooms or living rooms then the impact upon these becomes more pertinent and matters such as light loss, privacy and overbearing impact will need to be fully assessed and may prove detrimental. I note the design includes splayed windows at first and second floors to direct views from hotel rooms along the site thereby reducing direct views over adjoining property. Views from ground floor windows will be affected by intervening boundary treatments so are of little concern but third floor windows will also provide wide ranging views over nearby residential spaces. The Council recommends a minimum distance of 21m between habitable room windows as a minimum and where closer relationships are proposed the impact of loss of privacy will need to be very carefully considered. In urban settings there is a reasonable prospect that privacy expectations will be less than elsewhere by reason of the existing layout and existing relationships between buildings and windows. Furthermore, privacy is often an issue that can be easily mitigated by obscure glazing windows or altering window design.

My primary concern so far has been the potential for overbearing effect. This arises from the scale of the rear extension in relation to the houses at St Vincent Road in particular but may also affect adjoining residences. In relation to the latter, I am currently not clear on the internal layout and use of these buildings but there appears to be a mix of both flats and bedsits/HMO rooms. In any case, the impact upon residential amenity is a material consideration.

So, in relation to St Vincent Road dwellings, these benefit from a small outdoor amenity space to the rear. It appears to me that you propose to replicate the existing rear building line but narrow the width of the rear projection. The height of the rear extension close to the intervening boundary with St Vincent Road properties appears to be approximately 4.5m as the flat roof extension has a parapet wall above. These properties are located south of the proposed development site and the existing buildings at St Vincent Road cast shadow over these rear spaces for large parts of the day. The proposal is unlikely to demonstrably increase this in relation to St Vincent Road properties. In terms of privacy, it is unclear whether a 21m window to window distance will be achieved but it is fair to assume that the development will give rise to overlooking of these rear

amenity spaces. Whilst they appear to benefit from limited privacy at present, the effect of multiple hotel bedrooms facing the rear boundary at high level does have the potential to give rise to an unneighbourly effect to the detriment of neighbouring amenity. It is difficult to establish, based upon the information supplied, whether or not these views will be oblique or direct as the plans do not show the scheme in relation to these neighbouring dwellings. Oblique views that may allow some overlooking of parts of rear amenity spaces may well be acceptable but will have to be considered with the benefit of more comprehensive drawings that demonstrate future relationships.

This may warrant some reconsideration of design in terms of window styles, sizes, etc but at this stage I cannot advise further on this.

The revised design appears to show a 5 or 6m set back at second and third floors to mitigate the concerns I originally expressed. The design of the third floor has also altered and I welcome these changes. A rear escape staircase has been retained and causes me some concerns as it will be situated adjoining the rear boundary. I would encourage its relocation at this stage.

The set back at upper floors does serve to lessen my concerns in relation to the impact of the building's massing on the amenity of existing residents albeit that the increased height of building close to the intervening boundary will have an impact. I estimate based upon the information I have, that you propose to erect an extension approximately 6m high (i.e. the ground and first floor of the extension) and this will be higher than the 4.5m currently in place. However, the increase in height is not significant in my view and whilst it will result in some additional impact, I do not consider this to be of demonstrable harm. This is based on several assumptions in relation to the proposed plans that would need to be further clarified in any subsequent submission. However, the height of the existing rear single storey extension has been shown on previous survey drawings provided to the Council as part of older applications and I have taken my height measurement of the existing from these. I would encourage, as mentioned, the removal of the external staircase on the rear most wall and careful design consideration of this blank façade which is partially visible from public vantage points as well as being a dominant feature when viewed from the rear of existing residences.

Having regard to the concerns raised any future application should be accompanied by sectional details that include the properties at St Vincent Road. The Council will apply standard tests in relation to the impact of new development upon residential amenity. These include 45 degree light splays from habitable windows and 25 degree splays where appropriate. These tests are set out in the Council's adopted SPG on House Extensions and whilst this SPG is not directly relevant to the scheme proposed, the tests set out in it are well established and recognised means of assessing the impact of development.

In short, I am of the view that the set back of the upper floors and the re-design of the roof shown in the revised design brochure lessen the concerns I expressed in relation to overbearing effect and can be justified subject to the matters outlined above being addressed.

Conclusion

The scheme does, in principle, give rise to significant merits. The building is currently in a derelict state and its re-use and associated refurbishment is welcomed. The scheme has the potential to be a very positive development that will regenerate both the building and the wider area. I support it and welcome the obvious desire to complete a good quality, viable project in this part of Newport. As you know TJs is a listed building but also is a local landmark having regard to its previous connections to Newport's music scene. Therefore, future schemes for the building will likely draw attention from both the public and local elected members. Design quality will be essential having regard to the building's listed status and prominent setting, but a realistic and commercially viable development will be essential to ensuring that works on site progress and the end use is achieved. There are constraints to development and I have highlighted these to you in my comments here. Some changes to the layout/design in the revised design brochure are sought and may warrant further discussions in due course. Furthermore, any future application may generate some objections for statutory consultees. I have covered highways and parking matters above. However, these will always be balanced against scheme merits before making a final decision but in my view the provision of additional supporting information and additional plans will go some way

to mitigating any such concerns and this is when the quality of the application submission becomes critical.

Please note that major applications will be determined by Planning Committee and must be accompanied by a statutory pre application consultation report pursuant to the applicant's own pre application consultation exercise.

At this stage I suggest consideration of the points raised above and formulation of a list of supporting information and plans you intend to supply as part of a future application. I would be happy to review and agree such a list as part of this pre application process.

E-planning

We strongly encourage you to submit your applications to the planning department online via the 'Planning Portal' (www.planningportal.gov.uk). This will save money on printing costs and travelling/postage together with speed up the processing of your submission. You can attach drawings and supporting documents, including a professional quality site location plan; downloading the appropriate Ordnance Survey map and calculate the fees as part of submitting your application online.

Please contact myself to discuss any of the above further.

Yours sincerely

Joanne Davidson

Joanne Davidson
East Area Team Manager
Rheolwr Ardal y Dwyrain
Newport City Council
Cyngpr Dinas Casnewydd