



PLANNING HERITAGE

Conservation Planning Consultancy



HERITAGE STATEMENT

Project: St. Paul's Church, Commercial Street, Newport

Document issue: October 2023

© Planning Heritage Ltd.

No part of this report is to be copied in any way without prior written consent. Every effort is made to provide detailed and accurate information. However, Planning Heritage Limited cannot be held responsible for errors or inaccuracies within this report.

Planning Heritage Ltd.

Rengen House, 4 Argyle Street, Bath BA2 4BA

email: greg@planningheritage.co.uk

tel: 0779 226 4297

1	INTRODUCTION	2
2	THE PROPOSAL	2
3	THE APPLICATION SITE	2
4	HERITAGE ASSETS	6
5	HISTORIC CONTEXT	7
6	SIGNIFICANCE	8
7	HERITAGE IMPACT ASSESSMENT	10
8	CONCLUSION	12

1 INTRODUCTION

This statement has been prepared to provide appropriate and proportionate information to the local planning authority with regard to the heritage impacts relating to the redevelopment of the site at St Paul's Church, Commercial Road, Newport (the 'Site'). The existing building on the Site is listed at Grade II and is a recognised heritage asset. It is not located within the Town Centre Conservation Area (TCCA) at present, however the draft Town Centre Conservation Area Appraisal proposes the extension of the boundary and the extended conservation area would include the Site.

This new application submission follows and has also been directly informed by, a previously refused application for planning permission (21/1272) which comprised: *the Conversion of the church to 20 Nos. flats (comprising 16 Nos. 1 Bed and 4 Nos. 2 Bed flats) including the construction of dormer windows.*

As required by Technical Advice Note 24 (The Historic Environment), paragraph 1.12 that **when considering development proposals and other works to historic assets. It is important for those responsible to understand the heritage values and assess the significance of the historic assets that will be affected. There are four heritage values which need to be understood before the significance of the asset can be assessed.**

- Evidential value
- Historical value
- Aesthetic value
- Communal value

An understanding of these values forms the basis of a statement of significance prepared as part of a heritage impact statement.

The new report looks at the Site again afresh and also describes the likely heritage impacts of the revised scheme proposals (with a particular focus on the changes between this and the past dismissed scheme).

2 THE PROPOSAL

The proposals seek to convert the Site for residential accommodation, comprising 9 Nos. flats.

3 THE APPLICATION SITE

The Site is located towards the southern end of Commercial Road, on the west side at the junction with Palmyra Place.

The church is late Georgian building, dating from 1835 and conserved in 1837 in the Early English style to designs of T.H.Wyatt. Further alterations by Wyatt to the ceiling in 1842 were implemented and the sources indicate that the Site was subject to various works and refurbishment in 1859 (by G.Clark of Newport) and further redecoration and new porches (1888 by Habershon and Fawckner).

The land on the north side (Palmyra Place) rises up from Commercial Road, resulting in the church being set down below the land to the west and north.

The Site has been vacant since the congregation left in 2016 and the Church was sold in 2018. The building is acknowledged by all parties, has been in poor condition for many years, however it does not appear to be included upon the Buildings at Risk Register.

The church is set back from the edge of pavement within its own plot enclosed by ornate iron railings. The Commercial Road access is defined by the broad flight of stone steps which lead up to the entrance set within and beneath the central octagonal tower and spire. The interior of the entrance has been subjected to various arson attacks which have caused damage to the doors and smoke damage to the plasterwork and vaulted ceiling.

The surrounding townscape comprises a mix of commercial shops, a doctors surgery and residential properties

The **church, forecourt and railings** were listed at Grade II in May 1980 and the description states:

HISTORY

By T H Wyatt, 1835. Ceiling 1842, by Wyatt. Refurbished 1859 by G Clarke of Newport. Redecoration and new porches by Habershon and Fawckner 1888. The church was consecrated in 1836, and was then the only church within the town of Newport. Cost £5000, raised by public subscription. Closed for worship 1991.

EXTERIOR

Early English style. Rock-faced coursed stone with ashlar dressings; slate roofs. Commercial Street elevation has central octagonal tower and spire; stepped buttresses run up as pinnacles; lancets to bell stage of tower. Lower part of tower is open porch with tall Gothic arches; vaulted ceiling to porch with ribs and floral bosses. Gothic entrance doorways; stepped lancet to rear. Tower flanked by 2-light windows. Side elevation of 9 bays; end bays have steep gable with blind window. Tall 2-light window to each bay; low porch in second and last bays. West elevation of 5 bays has tall 2-light windows in outer bays, central polygonal apse.

INTERIOR

Aligned with chancel at E (Commercial Road) end of church. Broad, spacious undivided interior. Flat ribbed and boarded ceiling with wall brackets. Gallery to W end on iron columns has pierced wooden frontal. Apse below was baptistery. Shallow chancel beneath tall arch flanked by lower arches; 5-light stepped lancet window with stained glass; single lancet in outer bays. Doors to flanking vestries at E end. Seating and organ removed.

REASON FOR DESIGNATION

Rare example of church in Wales from late Georgian period, embodying architectural arrangements from time before Pugin and Camden movement dominated.

The interior of the church comprises mainly of a large single volume space with flat ceiling supported upon a series of beams spanning across from brackets. The altar, pulpit, choir stalls, seating and the organ have been removed. The altar was set in the chancel below the five lancet windows set in the middle of the east end between a set of organ pipes on each side. To the rear/west end are a series of modern offices and WCs. The main ceiling has been damaged by water ingress and is now propped.

Against the west end of the church was the gallery, supported upon cast iron columns, but as with other fixtures, this has been removed and the gallery doors blocked. Photographic sources show the seating arranged five rows across the main floor. Today, modern glazed partitions have been installed to create/sub-divide the main floor. Inserted structure dating from within the single volume of this space allows for main congregation area to be sub-divided.

Today, the Site is characterised by the vacancy of the building and dilapidated condition of the church. The condition blights the locality and the neighbouring properties.



1. St Paul's Church, Newport



2. The smoked damaged entrance porch



3. The entrance porch



4. The interior space with modern screen and propping.



5. Gallery door in east end



6. The chancel



7. Wooden frontal piece to removed gallery in west end



8. Cast iron columns supporting former gallery and entrance to offices and WCs



9. Scaffold propping of main ceiling



10. Offices in west end



11. Aerial photograph WAW010619 WALES (1947)



12. The Church and Commercial Road WAW010618 WALES (1947)

4 HERITAGE ASSETS

Designated Heritage Asset

The Technical Advice Note 24 (TAN24) defines in paragraph 1.7 a designated heritage asset as an **identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.**

Listed Buildings

The Site which includes the church as well as the forecourt and railings are listed at Grade II. It is this designated heritage asset whose significance has the potential to be affected directly by the proposed redevelopment.

Conservation Area: Town Centre

The Site lies outside the TCCA however the draft Town Centre Conservation Area Character Appraisal seeks to extend and revise the boundary of the TCCA and the Site will fall within the extended area. The draft appraisal states that the intention to include the whole length of Commercial Road is one based upon the recognition that **the buildings along the whole length of Commercial Street contribute to the character of the Conservation Area and are not discernible from those already included at the north end of Commercial Street.**

As such the Site is also within the wider setting of a number of designated and non-designated heritage assets. The TCCA was designated in March 1987 and subsequently reviewed in 2018. The extension of the boundary responded to changing heritage views on what is considered to be architecturally and historically important.

Historic Asset of Special Local Interest

TAN24 recognises that the historic environment includes both designated heritage assets as well as those assets identified by the local planning authority which make an important contribution to local distinctiveness and public knowledge. The draft character appraisal shows those properties considered to make a positive contribution and/or of local importance on Plan 3 (p.35).

Scoped out Heritage Assets

Outside the Site's boundary and within the identified surrounding area are designated and non-designated heritage assets. It has been assessed based on desk based research and through the site inspection that the significance of these other heritage assets is unlikely to be affected by the proposed development taking in to the consideration the potential for impacts by existing topography, street pattern, built form and/or dense foliage. Accordingly, they will not be discussed further in this report.

5 HISTORIC CONTEXT

Given the heritage sensitive nature of the scheme, the scheme has been informed by the assessment of the context in which it is located and archival sources.

The Site was consecrated in 1836 and at that time it was the only church within the town of Newport. The church is acknowledged as being unusual in Wales being that it dates from the late Georgian period. As an example of an Early English style church, it incorporates architectural elements that predate the time before the Pugin and Camden movements dominated ecclesiastical architecture.

The Site is located on land which is set above the Commercial Road and which to the rear on slopes up towards the housing and doctors surgery on Keynsham Avenue.

The assessment of the cartographic evidence revealed how the area developed from the time of the 1887 first edition OS map and that the gradual development of land for housings to the rear/west of the Site. The cartographic sources also show the extent of redevelopment of the surrounding townscape between 1887-1954 and the wider impact of the railway upon the landscape which served the Alexandra and North docks to the southwest of the town.



Fig.i: Extract from 1887 OS map



Fig.ii: Extract from 1902 OS map



Fig.iii: Extract from the 1921 OS map

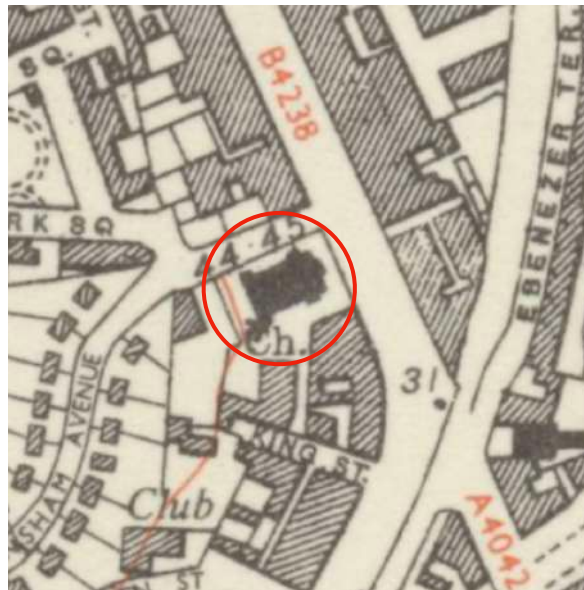


Fig.iv: Extract from the 1954 OS map

6 SIGNIFICANCE

Significance is unique to a place and it is vital to identify so that changes within the historic environment can be managed sensitively to ensure that significance is protected, as well as revealed, reinforced and enhanced at every possible opportunity.

The TAN24 definition of the significance of a heritage asset is **the sum of the cultural and natural heritage values of a place, often set out in a statement of significance.**

Likewise, the definition of the setting of a heritage asset is **the surroundings includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Setting is not itself a historic asset, though land within a setting may contain other historic assets.**

There are occasions when the significance of a building or place may be regarded simply as intrinsic. However, since significance is evaluated as a result of how a building or place is interpreted or perceived at a given moment, there are instances where significance can be regarded as a fluid concept that can either be eroded or enhanced, depending on the consequences of change. Significance can be eroded through, for example, partial demolition or inappropriate alterations. Alternatively, it can be enhanced through informed, considered change which can bring positive benefits. These benefits can include the revealing of heritage values, the re-assertion of historic integrity, facilitating greater public appreciation and the strengthening of communal values and uses – all of which may ultimately raise the level of significance. Thus the aims of managed change to protect, reveal, reinforce or enhance significance can be achieved through a variety of means including conservation, improved interpretation, understanding and/or presentation.

The following assessment of significance for the identified designated heritage asset of the former Church and the draft TCCA is proportionate to

the importance of this asset and also provides a sufficient level of description to understand the likely impacts of the proposals. This assessment work has been based on focused map progression, archival research, and on-Site investigative analysis.

historical development

The city of Newport has been a port since the Normans built the castle, however it was during the C19 that the accessibility to the docks was the catalyst for the rapid expansion of the settlement. The industrial revolution witnessed the development of Newport from a small seaport town to a global centre for steel production and the exportation of coal. This was further enhanced by the extension of the docks which added to Newport's reputation, making it the largest coal exporter in Wale Newport was until the mid-C19.

The period between the late C19 to early C20 was one of economic prosperity for Newport. In 1875, the Alexandra Docks opened and the town was expanding rapidly. In 1892 Alexandra South Dock opened and was the largest masonry dock in the world, although by this time the ports at Cardiff had overtaken Newport as the main coal exporter.

Newport's economy was varied and included foundries, engineering works, a cattle market, shops as well having the benefits derived from the connection with Bristol through the White Funnel Line across the Severn Estuary, which ran until the mid-1950s. However, the importance of the docks started to decline by the early C20 and some were eventually filled in and redeveloped. As the town's traditional heavy industries were wound down, they started to be replaced by new public and private sector employers, which enabled the town to retain a degree of economic prosperity.

The assessment of the Site has revealed that the church was built in 1835–36, on land donated to the parish by Sir Charles Morgan, who was notable for his trade and commercial interests in Newport. Originally built to seat 1000 people, the church was the first to built in Newport and in 1839 it became the parish church for the Diocese of Llandaff. The church continued to serve as a place of worship until it closed in 1991 after which a number of changes were

made to the building and the Site was reopened as a space for worship, community groups and local activities. The hall had a capacity of 300.

the issue of setting

The setting of a building or historic townscape, is defined in TAN24 paragraph 1.25 as one which includes **the surroundings in which it is understood, experienced, and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.**

Thus, it is the surroundings in which it is experienced that makes an important contribution to the quality of the specific environment. Elements of a townscape and thus the setting can often make a positive contribution to the significance of an asset. However, the visual relationship between the Site and the wider urban environment is not simply limited to its immediate surroundings but also through the visual significance of the spire which is visible from many public vantage points in the city.

The setting of the Site is one in which there is a variety of building types found along Commercial Road and those residential streets to the west. It is an eclectic character typical of an urban landscape and one that comprises a mix of commercial properties and housing being red brick, stucco and late C20 infill plots. The contribution to the character of the surrounding area made by the Site is derived from its scale and its ecclesiastical architectural presence, however this is diminished by the dilapidated condition of the Site as well as a number of adjacent properties. The sense of neglect and urban decay detracts and this results in a negative contribution to both the existing and proposed TCCA.

Overall, there is a variety of architectural styles and features, the predominant materials being red brick, with the elevational treatments of many properties having rich architectural styles and ornamentation.

Thus in assessing the conversion of the building and the introduction of new uses, this presents an opportunity to overcome the economic and social deprivation and stimulate an imaginative, high quality design solution that could provide an opportunity to enhance the Site and the wider area.

The design process has been directly informed by the previously refused application through the removal of the dormers and by reducing the level of internal subdivision. The scheme has tried to minimise the level of sub-division within the main space to achieve a viable use and in this way it is hoped that the proposals will make a positive contribution to the building and locality. The new scheme will offer an opportunity to maximise and revitalise the Site, enhance the architectural contribution to the area and enhance the setting of the surrounding housing.

Views

The Site is one that was designed to be seen from numerous public vantage points in the town and the recognition of the public nature of the Site has led to design changes for the new scheme. Key views in regard to the wider conservation area, are very much focused on views along Commercial Road which includes views of the Site and its spire.

The importance of maintaining the key views is accepted and the design has sought to ensure that those views are not compromised by inappropriate development. The existence and importance of these views will be retained and are of particular importance to the character of the conservation area.

The proposed development will introduce a new use in a manner that ensures the architectural style remains largely unaffected and the Site will in terms of its street presence will be retained. In this regard, the new scheme will be seen and understood in the context of a residential conversion that will enhance and the overall character of the urban landscape.

Summary of Significance

The Site has a mixture of high and low significance. Its high significance is found in the contribution it makes to the architectural character of area. However, it is accepted that the condition of the Site has for many years been 'poor' and this blights the wider location as well as the Site itself.

The assessment of the Site revealed the building has undergone several phases of redevelopment and remodelling most notably internally, leaving the building as a one with a large single use space that is redundant and in need of urgent repair to prevent the collapse of the ceiling. These changes to have reduced the architectural integrity of the ecclesiastical character and the obvious interventions have confused and compromised the appearance. Although the form of the Church is still legible, the lack of use and interior modifications ensure it makes only a neutral contribution to the character/appearance of the area.

Overall, this is a Site that makes a limited contribution to the character and appearance of the area. The contribution to the religious history of Newport is acknowledged and important, it is one that illustrates the important role that religion played in the development of C18 and C19 Britain and Wales. The redundancy of the sites, is however one that has been to the detriment of its heritage value and significance.

7 HERITAGE IMPACT ASSESSMENT

This statement of significance has been prepared to give a proportionate level of information and understanding of the Site with regard to the proposed redevelopment of the Site for residential accommodation with its associated facilities. The designated heritage asset which would be affected by the scheme proposals on Site have been properly identified as the former St.Paul's Church and although the site is not within a Conservation Area at present it is identified as such in the draft Town Centre Conservation Area appraisal which has been subject to public consultation and is a consideration.

As discussed in this report, the proposals have been informed by the Site constraints and the need to ensure that the special interest of the building is conserved so nothing of historic value is irretrievably lost and this includes the need to consider how to adapt the principle space within the building. The Site is one which has the potential to be enhanced through imaginative, high quality development that adds to the urban character of the townscape in which it is located.

In response to the previous comments, the scheme design was refined and also reduced in scale.

The sensitive design and positioning of new accommodation within the building would enhance the Site by establishing a permanent use, accepting that by doing so there would be a modicum of harm caused to the character of the building in the form of the subdivision of the primary internal space. The new scheme seeks to retain a full height central area which allows for views of the ceiling structure to be glimpsed from the communal space. Likewise, in response to the previous concerns, the visual impact of the conversion has been reduced by removing the previously proposed dormer windows which dominated the roof line and elevations. This increases its visual unobtrusiveness, and makes it more visually subordinate.

The scheme advocates change which although may be considered to make an impact initially, will not be detrimental to the longterm understanding of

the Site. This Heritage Statement has demonstrated the revised proposal has directly responded to previous comments of the Council and significantly reduced the visual alterations to the roof, which in turn makes the scheme more visually subordinate to the main elevation and wider urban landscape.

This is a scheme that will not harm the character of the urban landscape and it will enhance and compliment the Site without any harm or detriment to the wider character and appearance.

The significance of the conservation area is derived from its historical development, which remains legible in its existing pattern of its central green space and surrounding streets and its built form. This is an area of diversity in terms of the character of its building types, uses and building groups, which has resulted from its gradual and piecemeal development throughout the C19 and C20. To that extent, the proposed development, which has directly responded to concerns raised by the Council will form part of the gradual and piecemeal development which defines the area. It is our view that it will sustain rather than harm the significance of the surrounding conservation area, should it be extended in the future.

The proposed scheme seeks to convert the Church, which is considered overall to be a positive building but one in which the vacancy detracts from the character and appearance of the conservation area. There is an opportunity here therefore to affect replacement uses and built development on Site that would improve the existing condition and contribution to local distinctiveness. The scheme proposes the repurposing of the Site which would enhance the character and appearance of the conservation area directly through its new use and architectural design. The Site forms part of those key views along Commercial Road and these will remain unaffected (other than through use) within the conservation area. The conversion of the building would not affect any focal buildings or focal points identified as important to the significance of the conservation area, or noted within the Conservation Area Character Appraisal, in which it states that **where buildings are vacant, there is a clear opportunity to bring them back into a sustainable use. In particular, the deconsecrated St Paul's Church is a highly significant historic building in a prominent location and will need a sensitive development proposal to protect it.** Is

The scheme has been amended to reflect all previous heritage concerns raised by the local planning authority and we consider it to be an appropriate and positive response to the defining characteristics of the surrounding conservation area in terms of its architectural approach, form and detailing to the Site.

Overall, we consider the new application scheme would through delivery of new uses on Site, preserve the special interest of the building as well as character and appearance of the conservation area. It is a scheme that is would also contribute positively to the vitality and vibrancy of the area, and also introduce a new built form of a higher quality design, which would make its own contribution to this part of the conservation area.

7 CONCLUSION

The proposals are considered to be informed by their context, of an appropriate scale and form and using sympathetic materials that will respond successfully with the form of the building as well as the surrounding urban landscape. The proposals have been assessed to sustain and also to a degree enhance the use, character and appearance of the Site. The scheme therefore complies with the obligation to special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest.

The changes will ensure the Site is enhanced and is a fitting solution. It is a design that will compliment the location and it will also enable a scheme of restoration and repair to be implemented that will be bring about beneficial enhancement.

The key enhancement of this scheme would be the securing of the long-term viability of the Site through residential use in a manner that would not materially harm the heritage value of the place or the setting of the former church. It is recognised that in order to do so, there would be a need to adapt the interior however the loss of the whole space would amount to the minimum necessary to secure the future of the Site. This is scheme that minimises the harm and is one whereby the public benefit of securing the future of the heritage asset through such development outweighs that harm.

Some of these positive design considerations include the securing of a longterm use, the provision of additional housing, the enhancement of the Site through the repair and restoration and the appropriate detailing and use of materials and the legibility of a new use that will sit comfortably within an urban context. The delivery of new uses on Site would contribute positively to the vitality and vibrancy of the area.

Overall, the proposed scheme will improve the appearance of the townscape and the outlook of the surrounding properties. It is a scheme that will maintain the eclectic mix of built form which characterise this area and the significance, character and appearance of the Site would be sustained and also enhanced.

In conclusion, the application proposals would be in accordance with the principles of the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990; Planning Policy Wales (Edition 11), TAN 24 and policy SP9 of the Newport Local Development Plan. It is a scheme that will give the Site a viable use that will not be detrimental to the wider character, appearance or setting of the heritage assets.