

RESPONSE TO CONSULTEE COMMENTS AND DESIGN AMENDMENT STATEMENT

Reduction of fenestration to the south gable of the curtilage-listed stone outbuilding (byre)

Property: Samson Court Farm, Goldcliff, Newport, NP18 2PH

Listed building: Grade II (Cadw List Entry No. 17541) — curtilage-listed stone outbuilding (byre)

Application: Listed Building Consent and Full Planning Permission — Newport City Council ref. 26/0447

Amended drawings: 5997/005a (Ground Floor Plan), 5997/008a (Elevations) and 5997/009a (Sections A–A / B–B), Revision A, dated 27 July 2026

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Date: 5 August 2026

1. Introduction and purpose

- 1.1 This Statement is submitted on behalf of the owner of Samson Court Farm in response to the consultation responses received on the above application (Newport City Council ref. 26/0447), and to explain the amendment now made to the scheme. It should be read alongside the Heritage Statement (ref. HFWJ/5997). This revision of the Statement responds to each of the discrete matters raised in consultation, and adopts the statutory framework that applies in Wales following the Historic Environment (Wales) Act 2023.
- 1.2 The application seeks the conservation and beneficial re-use of a deteriorating curtilage-listed stone outbuilding (the early-nineteenth-century byre) as ancillary accommodation (a kitchen / family room) incidental to the farmhouse, together with the demolition of an unsympathetic twentieth-century concrete-block shed and the stabilisation and repair of the historic stone shell. The scheme is conservation-led: the principal (west) frontage of the listed group is unaltered and is enhanced by the removal of the C20 shed.
- 1.3 Following consultation — and in particular the concerns of the Council’s Principal Heritage Officer, SPAB and Historic Buildings & Places (HB&P) as to the extent of new glazing — the design of the *south gable* has been revised to **reduce the extent of glazing to the gable**, to **retain the high-level gable opening**, and to **reduce the bi-fold door to a three-leaf arrangement** (drawings 5997/005a, 008a and 009a, Revision A).
- 1.4 The applicant’s approach is not to contend that the amendment removes every concern. This Statement identifies each objection, states plainly which the amendment resolves, which it materially reduces, and which are to be addressed by further information; sets out the heritage and policy case for the reduced scheme; and acknowledges, and weighs openly, the residual harm that would remain.

2. The consultation responses received

- 2.1 Six statutory responses were received. Two made no substantive comment: the Royal Commission on the Ancient and Historical Monuments of Wales (30 June 2026), which advised it was unable to respond owing to staffing capacity; and The Georgian Group (31 July 2026), which advised that “it is considered that it is appropriate at this stage to make no comment.” The four substantive responses are set out below.

2.2 Principal Heritage Officer, Newport City Council (received 17 July 2026)

2.2.1 The Council's Principal Heritage Officer, Mr Guy Arnall, recommended refusal. The material passages are:

On the glazing: *"a large extent of modern glazing to both the southern gable end of the new, and the rebuilt eastern elevation of the byre (with rooflights above)."*

On character: *"This extensive alteration would fundamentally alter the character and appearance of the existing byre, resulting in harm to an element of the asset considered to be of medium-high significance."*

On demolition / structural justification: *"No structural surveys have been provided to demonstrate that this significant extent of demolition is justified (and that the existing structure cannot be repaired and stabilised). A CARE-accredited Engineer would be best placed to provide such advice."*

On setting: *"Setting does not depend on public rights of way or current ability to access the asset or viewpoints, though these can contribute to the significance of a historic asset and its setting."*

Conclusion: *"the proposed works would result in significant harm to the special architectural and historic interest of the grade II Listed asset... I would recommend this application for refusal."*

2.3 Society for the Protection of Ancient Buildings — SPAB (14 July 2026)

2.3.1 SPAB objected, principally to the glazing and bi-fold doors:

SPAB: *"The scale and proportions of the new opening, the extensive use of glazing, and the proposed aluminium-framed bi-fold doors appear visually dominant."*

SPAB: *"Extensive areas of glazing and the introduction of large contemporary openings would result in a marked domesticisation of the building."*

SPAB: *"We cannot support the proposed loss and extensive alteration of historic fabric associated with the opening up of the elevations."*

2.4 Historic Buildings & Places — HB&P (20 July 2026)

2.4.1 HB&P objected, citing the loss of historic fabric and planform to the byre and "the awkward and inappropriate form of the proposed extension." It suggested an alternative, that "the northern barn would likely be able to provide the desired large, open plan format proposed in this application", and that "there is no justification to add further floor space elsewhere."

2.5 Heneb: the Trust for Welsh Archaeology (28 July 2026)

2.5.1 Heneb supported the recommendation for refusal, but on procedural and archaeological grounds rather than the design of the fenestration: the status of the Historic Environment Record (HER) search, the role of the HER in relation to paragraph 8.10.1 of the Heritage Statement, the assessment of the Registered Historic Landscape and Historic Landscape Character Area, and its view that Cadw's opinion on the landscape and setting would be needed. These matters are addressed at Section 6.

3. Schedule of issues raised and how the amended scheme responds

3.1 The objections are not confined to glazing. The table below lists each discrete issue, the consultee(s) raising it, and the applicant's response, cross-referred to the sections that follow.

Issue raised	Raised by	Applicant's response
Scale and domestic character of new fenestration to the south gable	Heritage Officer; SPAB; HB&P	Materially reduced — gable glazing reduced to an approx. 3.6 m bi-fold; high-level apex opening retained (§5.1–5.3)
Aluminium bi-fold doors visually dominant	SPAB	Materially reduced — gable bi-fold now a three-leaf arrangement (§5.1)
Extent of glazing (approx. 5.4 m) and rooflights to the east elevation	Heritage Officer; SPAB	Retained on the screened rear elevation; substantially follows an existing doorway position; joinery removable but masonry loss permanent; residual harm acknowledged (§5.1, §5.10)
Loss of historic walling to south and east	Heritage Officer; HB&P; SPAB	More masonry now retained; residual loss is conditioned and mitigated; harm acknowledged (§5.4–5.5)
Loss of roof and first-floor loft structure	Heritage Officer; SPAB	Condition-led; salvage, solid-oak replacement and pre-works recording; harm acknowledged (§5.5)
No structural justification for demolition; CARE-accredited engineer requested	Heritage Officer	Condition evidence provided; authority invited to specify any further structural information needed to determine (vs conditionable detail) (§5.5, §7)
Additional floor space / "additional footprint" (17 m ²)	Heritage Officer; HB&P	Net built footprint reduced by approx. 16 m ² (17 m ² added vs 32.9 m ² C20 shed removed) (§5.6)
Asymmetric roof form and rooflights	Heritage Officer; SPAB	Consolidates later rear roofs; rooflights conservation type, confined to rear (east) slope (§5.6)
Stopping-up of the original west doorway	Heritage Officer	West arched doorway retained in situ and externally legible (§5.4)
Northern barn as an alternative location	HB&P	Determined on its own merits; availability of another building not a reason to refuse; its status not relevant to this application (§5.9)
Setting (not dependent on public access)	Heritage Officer	Effect on wider setting limited by inward-facing openings; physical fabric effect weighed separately (§5.3)
Registered Landscape / HLCA001 / HER / archaeology	Heneb	Procedural — HER enquiry progressing; Cadw landscape consultation is the LPA's step; authority invited to specify what is required (§6)

4. The amendment in summary

4.1 The revisions to the south gable, shown on drawings 5997/005a, 008a and 009a, are:

4.1.1 Reduced glazing to the gable. The area of new glazing to the south gable has been materially reduced, retaining a greater proportion of solid historic stonework and lessening the visual weight of the contemporary insertion.

4.1.2 Retention of the high-level gable opening. The high-level opening is retained. It echoes the byre's original agricultural loading openings (a timber loading opening survives in the north gable — Heritage Statement paragraph 5.2.4) and keeps the intervention faithful to its agricultural character rather than importing a domestic window pattern.

- 4.1.3 Reduction of the bi-fold to three leaves.** The ground-level bi-fold door in the south gable has been reduced to a three-leaf arrangement, approximately 3.6 m wide (drawing 5997/008a), narrowing the opening and retaining more masonry at low level.
- 4.2** For the avoidance of doubt, the larger glazed opening (approximately 5.4 m) and the three rooflights to the rear-facing east elevation remain as previously proposed; the applicant addresses these openly at §5.1 and §5.10 rather than presenting the amendment as resolving every concern.
- 4.3** The remainder of the conservation-led scheme is unchanged: the principal west front is not altered; the C20 concrete-block shed is removed; structurally compromised stone walling is stabilised and repaired in salvaged stone and lime mortar; the inserted C20 window to the inboard north wall is removed and reinstated in matching stone; and the byre is re-roofed in natural slate to match the farmhouse.

5. Response to the consultation concerns

5.1 The amendment reduces the gable glazing; the east opening is addressed openly

- 5.1.1** The concern common to the Heritage Officer, SPAB and HB&P is the extent of new glazing to the byre. In direct response, the south gable has been revised: the glazing is reduced to an approximately 3.6 m three-leaf bi-fold at ground level, with a single high-level opening retained in the apex, in place of the former full-width glazed gable. A materially greater proportion of solid historic masonry is retained. The acceptability of the reduced opening remains a matter of evaluative judgement, but the solid-to-void relationship is substantially improved and the degree of change is markedly less than that assessed by the consultees.
- 5.1.2** The applicant is transparent that the larger glazed opening to the rear-facing *east* elevation (approximately 5.4 m) and the three rooflights above remain as previously proposed. That elevation faces inwards to the rear yard and is screened from public view by the existing rear range; the opening substantially occupies the position of an existing historic doorway (Heritage Statement paragraph 7.4); the joinery would be removable and the opening capable of later infill, although its formation entails a permanent loss of historic masonry. The applicant acknowledges that this opening causes a degree of harm — weighed openly in the balance at §5.10 — and would welcome the opportunity to agree any refinement of its detailed design with the conservation officer.

5.2 The concern of “domesticisation” is met by an agricultural, high-level opening

- 5.2.1** SPAB’s concern was that the glazing “would result in a marked domesticisation of the building.” Reducing the glazing and retaining a high-level gable opening — a form that reads as an agricultural loft or loading opening rather than a domestic window — preserves the utilitarian character of the byre. The surviving timber loading opening in the north gable is the direct historic precedent. The amended gable is intended to read as a sensitive adaptation of a traditional outbuilding rather than a domestic conversion.

5.3 Setting and public visibility — a mitigating factor, not a decisive one

- 5.3.1** The applicant accepts the Officer’s point that “setting does not depend on public rights of way or current ability to access the asset”, and that the historic orchard curtilage, the reen and Monk’s Ditch to the east contribute to the asset’s setting. The absence of public visibility is therefore

advanced not as a decisive answer, but as a factor that limits the *degree* of effect on the wider setting.

- 5.3.2** On that limited basis: the only elevation visible from the highway and the principal public approaches — the west front, which carries the byre’s historic arched stock doorway, retained in situ behind a recessed infill (drawing 5997/005a, “door to be filled and recessed”) — is unaltered, and is enhanced by removal of the C20 shed; and the new openings are on the inward-facing south gable (into the farmyard) and the east elevation (screened by the existing rear range), so their effect on the appreciation of the asset from the surrounding historic landscape is contained. The applicant does not suggest that this removes the physical effect of the openings upon the fabric and intrinsic character of the byre. That effect is real, is acknowledged, and is weighed in the balance at \$5.10.

5.4 Retention of fabric, treatment of openings, and the limits of reversibility

- 5.4.1** By reducing the glazed area and narrowing the bi-fold, a greater proportion of the historic stone wall is retained in situ than under the original scheme. The original arched stock doorway on the principal west frontage is retained in situ and remains externally legible behind a recessed infill (Heritage Statement paragraph 7.2), so the most significant historic opening is preserved and read.
- 5.4.2** The applicant is candid about reversibility. The new joinery would itself be removable; the formation of the openings would, however, constitute a permanent loss of historic masonry — capable of future infill, but not of restoring the original fabric, coursing or patina. Reversibility is therefore limited, and is not relied upon as the primary justification for the intervention.

5.5 The loss of roof and wall fabric is condition-led; any further structural evidence should be proportionate and specified

- 5.5.1** The Officer objected to the “substantial demolition” of walling, loft structure and roof, and observed that “No structural surveys have been provided to demonstrate that this significant extent of demolition is justified... A CARE-accredited Engineer would be best placed to provide such advice.” The applicant’s position is as follows.
- 5.5.2** First, the extent of intervention is dictated by the recorded condition of the building. The Heritage Statement and its photographic record document a vertical crack to the south gable opening to approximately 80 mm at the parapet, partial collapse of the hayloft floor structure, extensive loss of slate covering with water ingress and rot to the roof carcassing, vegetation ingress, and part of the roof structure having already failed (Heritage Statement paragraphs 5.4.2 and 7.7). That condition has been inspected on site and assessed by a Chartered Building Surveyor (MRICS) — a professional qualified to appraise building condition, defects and repair. The submitted condition evidence demonstrates a clear need for substantial structural intervention.
- 5.5.3** Secondly, the information reasonably required to determine a listed building consent application must be proportionate to the scale and nature of the works and to the significance of the asset. The applicant has provided a professional assessment of condition; it does not accept that a full structural engineer’s appraisal is a precondition of a decision on a modest, ancillary conversion of this kind, and notes that the Officer’s reference to a CARE-accredited engineer is expressed as a preference (“would be best placed”) rather than as a stated requirement. If the authority nonetheless considers that specific further structural information is genuinely necessary in order to determine the principle or extent of demolition, the applicant invites it to identify precisely what information is required, and why, so that any further work is proportionate and targeted rather than open-ended.

- 5.5.4** Thirdly, the applicant will provide any such further information that is reasonably shown to be necessary to determine the application; and, to the extent that the justification for any particular element of demolition is a matter of detailed design and implementation, that can properly be secured by an appropriately worded condition — for example, a schedule of retained, repaired and replaced fabric, and a method statement for the stabilisation and repair works, to be approved before works commence. That is the proportionate mechanism for detail of that kind.
- 5.5.5** Where fabric must be lost, the impact is mitigated: the replacement roof structure is in solid oak rather than softwood; individual historic timbers are salvaged and re-used, or displayed, where serviceable; and a measured and photographic record is made before works and deposited with the HER (Heritage Statement paragraphs 7.7 and 10.3).

5.6 The additional footprint and roof form

- 5.6.1** HB&P objected that “there is no justification to add further floor space elsewhere.” Drawing 5997/005a identifies an additional footprint of 17 m². That modest, single-storey addition must, however, be read together with the wider works: the scheme simultaneously removes the twentieth-century concrete-block shed, which drawing 5997/001 records as 32.9 m². The net effect is therefore a reduction of approximately 16 m² in the built footprint of the group — not an increase. The scheme does not enlarge the overall mass of the listed group; it reduces it, while substituting a modest, well-designed ancillary element for a larger, unsympathetic twentieth-century structure. The applicant recognises that a net reduction in overall footprint does not, by itself, establish the acceptability of the new element — that depends on its relationship with the historic byre and the fabric affected — and the comparison is therefore advanced as contextual mitigation rather than as a complete answer to the objection.
- 5.6.2** The asymmetric rear roof slope is designed to consolidate the disparate later rear roofs under a single ordered slate slope (Heritage Statement paragraph 7.6.2). The three rooflights are of conservation type and are confined to the rear-facing (east) roof slope, away from the principal frontage.

5.7 Optimum viable use

- 5.7.1** The deteriorating condition of the byre is a material consideration in weighing the *consequences of refusing* the proposed works; it does not, of itself, compel approval. The proper test is whether the degree of alteration proposed is the minimum necessary to secure an appropriate viable use. In the applicant’s professional design judgement, the reduced openings strike a reasonable balance between the daylight and access needed for the accommodation and the retention of historic fabric, and it is the securing of a beneficial use that funds the substantial conservation of the stone shell and the re-roofing in natural slate — one of the most effective means of conserving a historic asset recognised in Planning Policy Wales and Cadw’s Conservation Principles. Should the authority consider, following the reduction to the gable, that the extent of glazing remains a determinative concern, the applicant would provide a short comparative illustration of the options considered; it does not accept that a formal daylight assessment is necessary for a conversion of this scale.

5.8 Continuity of stewardship

- 5.8.1** Samson Court Farm has been held and lived in by the same family across multiple generations. The proposals are the means by which that family secures the future of a cherished building at the heart of its home and working farm. That continuity of stewardship increases the likelihood that the conservation benefits will be realised and maintained, and the continued lived-in, working

character of the farmstead sustains the agricultural character of the Gwent Levels Registered Landscape within which the site sits.

5.9 Alternative location — the northern barn

5.9.1 HB&P suggests that “the northern barn would likely be able to provide the desired large, open plan format.” The existence of a possible alternative does not, in itself, render the chosen scheme unacceptable; each option falls to be assessed on its own heritage merits, and the relevant question is whether the proposed works represent an acceptable means of securing a viable use. The applicant’s position is that the byre is the appropriate location because it directly adjoins the farmhouse and can function as ancillary kitchen accommodation incidental to it, and because its re-use secures the repair of the very structure that is deteriorating.

5.9.2 The application falls to be determined on its own merits. The availability of another building is not, in itself, a reason to refuse consent for the conservation and beneficial re-use of this one. Converting a separate barn would leave the deteriorating byre — the very curtilage-listed asset at risk — unrepaired, and would be likely to require an equivalent or greater degree of new opening and intervention to achieve the same accommodation. The status of any other farm building is therefore not a matter that bears on the determination of this application, which concerns the byre.

5.10 The heritage and policy balance

5.10.1 The applicant acknowledges that the formation of new openings, the replacement of unsalvageable structural timbers and the alteration of the roof form would cause a degree of harm to the significance of the byre, to which appropriate weight must be given under section 96 of the Historic Environment (Wales) Act 2023 — the duty to have special regard to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest. The Officer’s finding of “significant harm” was based on both the extent of demolition and the scale of modern intervention, including the previously extensive glazing. The amendment materially reduces one important component of that harm — the glazing to the south gable, now a three-leaf bi-fold with a retained high-level opening — while the concerns regarding the extent of demolition and structural fabric are addressed at §5.5. Weighed overall, the magnitude of the residual harm is materially lower than that originally assessed.

5.10.2 That residual harm falls to be weighed against the material heritage benefits of the scheme: the stabilisation and repair of failing historic masonry; securing an appropriate viable use for a deteriorating curtilage-listed building; the removal of intrusive C20 fabric and restoration of the visual primacy of the historic byre; the reinstatement of an unbroken historic stone face to the north wall; and re-roofing in natural slate to unify the historic group. Applying section 96 of the 2023 Act, Planning Policy Wales (Chapter 6), TAN 24 and Policy SP9 of the Newport Local Development Plan, it is submitted that these benefits, taken with the reduced and largely private residual impact, are sufficient to justify the amended scheme.

6. Procedural and landscape matters (Heneb)

6.1 The matters raised by Heneb are acknowledged; they are procedural and archaeological, and are not objections to the fenestration. The applicant is progressing the outstanding HER enquiry. It is noted, with respect, that obtaining Cadw’s consultation response on the Registered Landscape and setting is a step for the local planning authority to take. To the extent that further assessment of

the Registered Historic Landscape or the Historic Landscape Character Area (HLCA001), or any site-specific archaeological input, is considered necessary, the applicant invites Heneb and the authority to specify precisely what is required, and will respond proportionately; whether any resulting mitigation can appropriately be secured by condition can then be determined in the light of that advice.

7. Information and next steps

7.1 The applicant has submitted a Heritage Statement, a photographic record and a condition assessment by a Chartered Building Surveyor, and amended drawings that reduce the extent of intervention in direct response to consultation. The applicant will provide any further information that is reasonably shown to be necessary to determine the application. So that this may be done proportionately and without delay, the applicant respectfully invites the Principal Heritage Officer to confirm precisely what further information (if any) he considers necessary in order to determine the application — in particular in relation to structural justification — distinguishing information required to decide the principle and extent of the works from detailed design and methodology that may properly be secured by condition. A pre-determination discussion to that end would be welcomed.

8. Conclusion

- 8.1** The revised scheme materially reduces the extent of intervention to the south gable by reducing the glazing, retaining a high-level agricultural opening and reducing the bi-fold door to three leaves. This directly responds to — although it does not wholly remove — the concerns regarding domesticisation and loss of fabric. The applicant acknowledges that the formation of new openings, the replacement of unsalvageable structural timbers and the alteration of the roof form would cause a degree of harm to the significance of the byre, which must be afforded appropriate weight under section 96 of the Historic Environment (Wales) Act 2023. It is not suggested that the absence of public visibility removes that physical effect; rather, it limits the effect upon the wider setting and the public appreciation of the listed group.
- 8.2** That residual harm should be weighed against the conservation benefits of stabilising the deteriorating masonry, securing an appropriate viable use, removing intrusive twentieth-century fabric, repairing the roof and preserving the building as part of the historic farmstead. The applicant has provided professional condition evidence and amended drawings that reduce the identified harm, and will provide any further structural information reasonably shown to be necessary to determine the application; the applicant invites the authority to specify precisely what, if anything, it requires, detailed design and methodology being capable of being secured by condition.
- 8.3** The applicant therefore requests that the amended proposals are reconsidered against the statutory duty in section 96 of the 2023 Act and the current provisions of Planning Policy Wales and TAN 24, and that Listed Building Consent and Full Planning Permission be granted.

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