

Cooke, Jacob (Senior Planning Officer)

From: Arnall, Guy
Sent: 03 December 2025 10:21
To: Cooke, Jacob (Senior Planning Officer)
Subject: RE: Planning Re-Consultation Request for case ref: 25/0175 (31-34 Commercial Street Newport NP20 1RL) (DOC)

Hi Jacob

Revised response below, please supersede.

Re: PARTIAL DISCHARGE OF CONDITIONS 2 (CEMP), 3 (SOUND INSULATION), 4 (GLAZING AND VENTILATION), 5 (WASTE), 7 (ECOLOGICAL ENHANCEMENT) AND 8 (MATERIALS) OF 24/0010 PROPOSED CONVERSION OF FIRST, SECOND AND THIRD FLOORS, LOFT CONVERSION AND EXTENSION OF ROOF SPACE TO FORM 16 NO. FLATS

Condition 02

No development shall take place until a site specific Demolition and Construction Environmental Management Plan has been submitted to and been approved in writing by the Council. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The plan should include, but not be limited to:

- Procedures for maintaining good public relations including complaint management, public consultation and liaison*
- Arrangements for liaison with the Newport City Council Noise & Neighbourhood Team*
- Deliveries to and removal of plant, equipment, machinery and waste from the site must only take place within permitted hours*
- Mitigation measures as defined in BS 5228: Parts 1 and 2 : 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.*
- Procedures for emergency deviation of the agreed working hours.*
- Measures for controlling the use of site lighting whether required for safe working or for security purposes.*
- Measures to mitigate demolition dust and material causing a nuisance to local residents, for example sheeting of loads and wheel washing apparatus*

Reason: To protect the amenities of occupiers of other premises in the vicinity in accordance with Policy GP2 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

No comments.

Condition 03

Prior to commencement of development, a scheme of sound insulation works to the floor/ceiling/party wall structures between each flat and between adjacent properties including the ground floor commercial unit shall be submitted and agreed in writing by the Local Planning Authority. The development shall be undertaken in accordance with the agreed detail and retained for the duration of the use.

Reason: In the interests of residential amenity in accordance with Policy GP2 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

No comments.

Condition 04

Prior to commencement of development, details of the glazing and ventilation which includes acoustically insulated trickle vents shall be submitted and agreed in writing by the Local Planning Authority. The development shall be undertaken in accordance with the agreed details and retained for the duration of the use.

Reason: In the interests of residential amenity in accordance with Policy GP2 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

Trickle Vents

As existing, the timber windows to principal elevations are very ornate, with particular interest attributable to the curved-plan sashes which terminate the projecting bays, the ornate flared heads to the stiles of the larger bay windows, the segmental and semi-circular heads to the sashes of the first floor, and the 'eared' upper sashes to the second floor (which mirror the form of the stone surrounds). These windows make a very positive contribution to the character and appearance of the building - and the conservation area.

The supplied Condition 04 Discharge Report states that:

“The existing building retains original timber-framed windows on both the front and side elevations. These external window frames and glazing will remain completely unaltered externally. No changes will be visible from outside the building, ensuring full compliance with the approved heritage and conservation requirements.

To improve acoustic and thermal performance while preserving the building’s original appearance, a secondary [uPVC] glazing system will be installed internally, set approximately 100 mm behind the existing timber windows.”

However, it goes on to state that: *“Acoustic trickle vents (Titon SF Xtra Sound Attenuator 4000EA) will be installed within the existing timber window frames, positioned at the head of each habitable room window.”*

This is contrary to the previous statement that *“external window frames and glazing will remain completely unaltered externally”*. In my view, the proposed would be very unsightly (see below) and would result in unacceptable harm to the special interest of the historic building (and therefore the Town Centre Conservation Area). In addition, they would be impossible to fit to the existing and highly characterful windows of the building’s principal elevations, due to the fine visible margins of the existing timber sash windows beyond the masonry surrounds – and the segmental/semi-circular heads of many of the existing windows.



Proposed SF Xtra Sound Attenuator (Acoustic) Vent

I am unclear as to what drawings the *“ALL ELEVATIONS – WINDOW & VENTILATION CLARIFICATION”* document (dated 05/06/2025) refers to, and as to whether any trickle vents are proposed to the existing timber windows to front elevation as part of this document. Irrespective of this, it is considered that all documentation, including drawings, will need to omit any trickle-vents to the existing timber windows of the principal elevations. This document also

proposed to replace existing timber casements and fanlights to the principal elevation in uPVC. I am unclear which windows these are, but it is likely to result in harm to special character. The document also proposes: *“Side elevation windows (Codes A–D) are mixed-condition timber casements set within deep brick reveals. All will be exchanged for white slim-line UPVC units, reproducing cill heights and mullion dimensions.”* Considering that the existing windows to the side elevation also comprise of segmental and semi-circular heads to the sashes of the first and second floors, and the 'eared' upper sashes to the third floor (which mirror the form of the stone surrounds), they contribute positively towards the character of the building and the conservation area and their loss to crude uPVC installations is also not supported.

Please note that Drawing BC-S4 RV-4 A210 varies between that supplied within the 'Window Details' pack and that appended to the Condition 04 Discharge Report. The former appears to show alteration to the windows of the first-floor front elevation and annotation proposes to follow *“...a contemporary classical approach, incorporating white slim-line UPVC windows in a symmetrical layout, with frameless Juliet balconies and acoustic glazing. While respecting the original proportions and simplicity of the facade, modern materials and techniques are adopted to meet current performance standards.”* This appears to have been superseded by that appended to the Condition 04 Discharge Report (contrary to the drawing revisions) and should not form part of any DOC approval.

To the courtyard elevations, it is now proposed to install sliding sash uPVC windows. Details for new have been provided in drawing BC-S4 RV-4 A213. However, it does not make explicitly clear within this drawing that the proposed material is uPVC. Whilst we might accept such windows to those areas which are unseen from the public realm of the conservation area, this is also variation from information approved under full application 25/0175.

Regarding building regulations, the below should be duly considered.

According to Approved Document F:

“Exemptions

0.4 Certain types of building are exempt from the Part F requirements of the Building Regulations. These are outlined in paragraphs A7 to A13 of the Manual to the Building Regulations.

Historic and traditional buildings

0.5 Work to the following types of dwellings may not need to comply fully with the ventilation standards in this approved document.

- a. Those listed in accordance with section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*
- b. Those in a conservation area designated in accordance with section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*
- c. Other historic buildings with a vapour-permeable construction that both absorbs moisture and readily allows moisture to evaporate. These include those built with wattle and daub, cob or stone and constructions using lime render or mortar.*

0.6 Work to a building in paragraph 0.5 should comply with the ventilation standards in this approved document where reasonably practicable. The work should not result in either of the following outcomes.

- a. Unacceptably affect the significance of the listed building, conservation area or scheduled monument.*
- b. Increase the risk of long-term deterioration of the building fabric or fittings.”*

According to Approved Document E:

“0.7

In the case of some historic buildings undergoing a material change of use, it may not be practical to improve the sound insulation to the standards set out in Tables 1a and 1b. The need to conserve the special characteristics of such historic buildings needs to be recognised¹, and in such work, the aim should be to improve sound insulation to the extent that it is practically possible, always provided that the work does not prejudice the character of the historic building, or increase the risk of long-term deterioration to the building fabric or fittings. In arriving at an appropriate balance between historic building conservation and improving sound insulation it would be appropriate to take into account the advice of the local planning authority's conservation officer. In such cases it will be reasonable to improve the sound insulation as much as is practical, and to affix a notice showing the sound insulation value(s) obtained by testing in accordance with Regulation 41 or 20(1) and (5), in a conspicuous place inside the building."

According to Approved Document L:

"Exemptions for listed buildings, buildings in conservation areas and scheduled monuments

0.8 Work to the following types of dwellings does not need to comply fully with the energy efficiency requirements where to do so would unacceptably alter the dwelling's character or appearance.

- a. Those listed in accordance with section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*
- b. Those in a conservation area designated in accordance with section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*
- c. Those included in the schedule of monuments maintained under section 1 of the Ancient Monuments and Archaeological Areas Act 1979.*

0.9 Work to a dwelling in paragraph 0.8 must comply with the energy efficiency requirements where this would not unacceptably alter the dwelling's character or appearance. The work should comply with standards in this approved document to the extent that it is reasonably practicable."

Historic England's "Energy Efficiency and Historic Buildings Secondary Glazing for Windows (2016)" is a document endorsed by Cadw. On p.6, it states that:

"If secondary glazing is the preferred solution, then the outer windows are best left without draught-proofing so that there is a degree of ventilation to the air space between the outer windows and the secondary glazing to prevent the build-up of condensation."

A comprehensive revisit is required to the proposed approach (and to align all documents), to ensure no harm is propose to the character and appearance of the conservation area. In my view, all timber windows to front and side elevations should be retained and externally visible trickle vents omitted.

Condition 05

Notwithstanding the submitted details regarding waste, a detailed waste management plan, including details of the chargeable daily bag collection, shall be submitted to and agreed in writing prior to the first beneficial occupation of the residential units hereby approved. The waste strategy shall be operated at all times for the duration of the use. REASON: To ensure waste arising from the development is managed in a suitable manner in accordance with Policy W3 of the Newport Local Development Plan 2011 –2026 (Adopted January 2015).

No Comments.

Condition 07

Prior to the first occupation of the first residential unit, a scheme of ecological enhancement shall be submitted to and agreed in writing by the Local Planning Authority. The scheme shall be undertaken in accordance with the agreed details and timescales.

REASON: To provide biodiversity enhancements in accordance with Policy GP5 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

It is stated within the supplied Discharge Pack (ref. no.24/0010) that: *“Bat/bird nesting boxes installed where required.”*

These are shown to the rear elevation within page 22 of the DISCHARGE PACK DATE: 13/02/2025 REFERENCE NO.: 24/0010.

I have no issue with this as they will be unseen from principal CA public realm locations.

Condition 08

Prior to the commencement of development, details of all materials to be used on the external surfaces of the extensions hereby approved shall be submitted to the Local Planning Authority. The development shall be undertaken in accordance with the agreed details.

REASON: In the interests of character and appearance in accordance with Policies GP6 and CE7 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

Regarding proposed materials, it is stated within the supplied Discharge Pack (ref. no.24/0010) that:

“The following materials have been selected to match or complement the existing structure, ensuring continuity in design, character, and sustainability. The materials meet relevant British Standards (BS) and UK Building Regulations regarding durability, fire resistance, and energy efficiency.

1. Walls

- *Material: Brickwork*
- *Colour/Finish: Buff (yellow/brown)*
- *Manufacturer: In Touch with Bricks (Selco)*
 - *Material Type: Clay*
 - *Finish: Creased & Sanded*
- *Compliance: Matches existing brickwork for visual consistency and compliance with LDP Policy GP6.*

2. Roof

- *Material: Welsh Slate*
- *Colour/Finish: Blue/Grey*
- *Manufacturer: Greys Reproduction Welsh Blue/Grey Slate*
- *Compliance: Ensures compatibility with existing roofing materials, in line with conservation requirements (Policy CE7).*

3. Windows and Doors

- *Material: Timber (white) / Aluminium & Glass*
- *Colour/Finish: To match existing*
- *Compliance:*
 - *Windows: No replacements required. Existing windows will be retained to maintain architectural consistency.*
 - *Doors: Upgraded for enhanced security and compliance with BS 6375 (Performance of Windows and Doors).*

VISUAL REPRESENTATION OF PROPOSED MATERIALS

To provide a clear reference, photographic evidence of the proposed materials has been included in this submission. These images depict how the materials will integrate with the existing architectural elements, ensuring seamless visual and functional adaptation.”

I cannot see that photographic evidence or samples for the proposed materials have been provided.
The above statement regarding windows (*No replacements required. Existing windows will be retained to maintain architectural consistency*) does not correspond with the approach now proposed (as per my comments in response to Condition 4).

Many thanks,

Guy Arnall

Prif Swyddog Treftadaeth / Principal Heritage Officer
Swyddog Dirprwyedig (Adeiladau Rhestredig) / Delegated Officer (Listed Buildings)

Adfywio a Datblygu Economaidd / Regeneration and Economic Development
Cyngor Dinas Casnewydd / Newport City Council

E: Guy.Arnall@newport.gov.uk | Planning@newport.gov.uk

From: Arnall, Guy
Sent: 31 October 2025 12:21
To: Cooke, Jacob (Senior Planning Officer) <Jacob.Cooke@newport.gov.uk>
Subject: RE: Planning Re-Consultation Request for case ref: 25/0175 (31-34 Commercial Street Newport NP20 1RL) (DOC)

Hi Jacob

Re: PARTIAL DISCHARGE OF CONDITIONS 2 (CEMP), 3 (SOUND INSULATION), 4 (GLAZING AND VENTILATION), 5 (WASTE), 7 (ECOLOGICAL ENHANCEMENT) AND 8 (MATERIALS) OF 24/0010 PROPOSED CONVERSION OF FIRST, SECOND AND THIRD FLOORS, LOFT CONVERSION AND EXTENSION OF ROOF SPACE TO FORM 16 NO. FLATS

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No development shall take place until a site specific Demolition and Construction Environmental Management Plan has been submitted to and been approved in writing by the Council. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The plan should include, but not be limited to:

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- Procedures for emergency deviation of the agreed working hours.*
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Reason: To protect the amenities of occupiers of other premises in the vicinity in accordance with Policy GP2 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

No comments.

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Prior to commencement of development, a scheme of sound insulation works to the floor/ceiling/party wall structures between each flat and between adjacent properties including the ground floor commercial unit shall be submitted and agreed in writing by the Local Planning Authority. The development shall be undertaken in accordance with the agreed detail and retained for the duration of the use.

Reason: In the interests of residential amenity in accordance with Policy GP2 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

No comments.

Condition 04

Prior to commencement of development, details of the glazing and ventilation which includes acoustically insulated trickle vents shall be submitted and agreed in writing by the Local Planning Authority. The development shall be undertaken in accordance with the agreed details and retained for the duration of the use.

Reason: In the interests of residential amenity in accordance with Policy GP2 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

As existing, the timber windows to principal elevations are very ornate, with particular interest attributable to the curved-plan sashes which terminate the projecting bays, the ornate flared heads to the stiles of the larger bay windows, the segmental and semi-circular heads to the sashes of the first floor, and the 'eared' upper sashes to the second floor (which mirror the form of the stone surrounds). These windows make a very positive contribution to the character and appearance of the building - and the conservation area.

The elevations approved under 24/0010 proposed retention of white-painted timber windows to the upper floors of principal elevations of west and the south (see Drawing no. *P639b L_210*) - and to the internal courtyard/rear elevations (see Drawings *P639b L_212* and *P639b L_211*).

It is now proposed to replace most timber windows in uPVC. This would presumably require submission of a variation for the approved information.

Notwithstanding the variation required, it is considered that the replacement of painted timber with uPVC to the principal and prominent elevations of this unlisted asset would result in a clear and detrimental change in material, whereby the uPVC material would be a clear contrast to timber. It is our position that such replacement in uPVC results in a cruder, more rudimentary window frames with a synthetic plastic finish that would not follow the slender gloss appearance of painted timber frames.

In addition, and though 'typical details' have been supplied, it remains unclear what the proposed uPVC windows will look like elevation – and indeed whether it is possible to replicate the finer details of timber joinery – in particular:

- The slim profile sections to meeting rails and stiles
- The visible sash mechanisms within the box reveals
- The box margins against the stonework surrounds
- The ornate flared heads to the stiles of the larger bay windows
- The segmental and semi-circular heads to the sashes of the first and second floors
- The 'eared' upper sashes to the second floor (which mirror the form of the stone surrounds).

I would suggest that these cannot be adequately replicated in uPVC and the change in materiality cannot adequately be overcome.

If the applicant wishes to return to timber, we would ask for sufficient detail for each window type, as below.

- Detailed side-by-side drawings (for easy comparison) annotated with dimensions, normally:
 - existing and proposed elevations

- Existing and proposed vertical sections
 - Existing and proposed horizontal sections
 - larger scale details for ‘horns’ etc
 - All of which show their externally visible frame dimensions (including their position within their masonry surrounds).
- Any proposed slimline double glazing to have coloured perimeter seals to match the painted frame finish. I would also note that discreet vacuum DG units with low u-values are also available, such as [LandVac](#).
 - Details of proposed frame paint colour.
 - We would generally recommend Hardwood or Acetylated Timber (such as Accoya) is used. Modern softwoods are very fast-grown and generally have none of the longevity of historic ‘first growth’ timber, which is much less prone to decay over time.
 - Trickle-venting can be obtained via routes through the head of the timber sash box – we do not want to see surface-applied vents to the new windows. This should be made clear.

Whilst we might accept variation which proposes uPVC units to the rear elevations only (which are unseen from the public realm of the conservation area), as things stand, the proposed would not be considered to preserve the character or appearance of the building or the area and this discharge of condition should be refused.

Condition 05

Notwithstanding the submitted details regarding waste, a detailed waste management plan, including details of the chargeable daily bag collection, shall be submitted to and agreed in writing prior to the first beneficial occupation of the residential units hereby approved. The waste strategy shall be operated at all times for the duration of the use. REASON: To ensure waste arising from the development is managed in a suitable manner in accordance with Policy W3 of the Newport Local Development Plan 2011 –2026 (Adopted January 2015).

No Comments.

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REASON: To provide biodiversity enhancements in accordance with Policy GP5 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

It is stated within the supplied Discharge Pack (ref. no.24/0010) that: “Bat/bird nesting boxes installed where required.”

Where are these proposed? We do not want to see them installed in prominent locations.

Condition 08

Prior to the commencement of development, details of all materials to be used on the external surfaces of the extensions hereby approved shall be submitted to the Local Planning Authority. The development shall be undertaken in accordance with the agreed details.

REASON: In the interests of character and appearance in accordance with Policies GP6 and CE7 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

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I cannot see that photographic evidence for the proposed materials has been provided.

The above statement regarding windows does not comply with that proposed within accompanying elevation drawings (as per my comments in response to Condition 4.

Many thanks,

Guy Arnall

Prif Swyddog Treftadaeth / Principal Heritage Officer
Swyddog Dirprwyedig (Adeiladau Rhestredig) / Delegated Officer (Listed Buildings)

Adfywio a Datblygu Economaidd / Regeneration and Economic Development
Cyngor Dinas Casnewydd / Newport City Council

E: Guy.Arnall@newport.gov.uk | Planning@newport.gov.uk

-----Original Message-----

From: planning@newport.gov.uk <planning@newport.gov.uk>

Sent: 28 October 2025 14:14

To: Arnall, Guy <Guy.Arnall@newport.gov.uk>

Subject: Planning Re-Consultation Request for case ref: 25/0175

Dear Principal Heritage Officer

Please find attached correspondence from Newport Council with regards to planning application:

App Number: 25/0175

Address: 34 First Floor Commercial Street Newport NP20 1RL

Proposal: PARTIAL DISCHARGE OF CONDITIONS 2 (CEMP), 3 (SOUND INSULATION), 4 (GLAZING AND VENTILATION), 5 (WASTE), 7 (ECOLOGICAL ENHANCEMENT) AND 8 (MATERIALS) OF 24/0010 PROPOSED CONVERSION OF FIRST, SECOND AND THIRD FLOORS, LOFT CONVERSION AND EXTENSION OF ROOF SPACE TO FORM 16 NO. FLATS

submitted on 6 March 2025.

View details of 25/0175 at Newport Council - Planning Online:

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpublicaccess.newport.gov.uk%2Fonline-applications%2Fplan%2F25%2F0175&data=05%7C02%7CGuy.Arnall%40newport.gov.uk%7C2729da6d4c56492b284b08de162c3433%7C2c4d0079c52c4bb3b3cad8eaf1b6b7d5%7C0%7C0%7C638972577588961156%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIsIlAiOiJXaW4zMilslkFOljoitWFPbCIsIdUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=xKLz%2FMgHd7av29IS%2BTo5L21wfmQVeSBtGKNLaxauh2c%3D&reserved=0>

Your sincerely

Development Management