

Delegated Decision Report

Application No:	25/0860	Statutory Period Expires:	25th February 2026
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Site:	<i>The Priory Hotel High Street Caerleon Newport NP18 1AG</i>		
Proposal:	<i>PROPOSED RELOCATION AND INTERNALISATION OF EXISTING KITCHEN EXTRACTION EQUIPMENT AND ASSOCIATED WORKS</i>		
Applicant:	<i>The Priory Hotel</i>		
Type:	Listed Building	Ward:	Caerleon
Decision:	GRANTED, SUBJECT TO CONDITIONS		

1. BACKGROUND

- 1.1 This application has been submitted to Newport City Council as a standalone application for Listed Building Consent. Due to the nature of the proposal, no associated application for Full Planning Permission is required.
- 1.2 A Listed Building Enforcement Notice (E25/0046) was served on 03/04/2025 regarding installation of an unauthorised flue at The Priory Hotel. This application seeks an alternative means of achieving such kitchen fume extraction, without impacting unduly upon the special architectural and historic interest the Grade II Listed asset. Following approval, the above-mentioned enforcement notice shall remain place until all unauthorised features of the existing installation have been removed and made-good, according to the requirements of E25/0046.

2. SITE LOCATION AND CONTEXT

- 2.1 The application site is a Grade II listed hotel and restaurant, prominently located upon the south-side of High Street in Caerleon. It is said to have been built on the site of a Cistercian priory of probably C12 date. It was a private house of the Morgan family from 1450 to 1835 and has been a hotel since the mid C20. Cadw's list entry describes the building as an early-C19 Tudor Revival house with earlier origins but retaining significant historic character and having strong group value with the surrounding historic buildings in the centre of Caerleon.

3. DESCRIPTION OF DEVELOPMENT

- 3.1 Installation of a new, internalised kitchen extraction system is proposed, by locating free-standing equipment within a space which currently operates as a first-floor private dining room above the kitchen. A new square opening (approx. 0.77m x 0.77m) through the floor structure will accommodate ductwork between ground and first floors.

Externally, it is proposed to replace an existing modern fire door with a louvre panel for ventilation discharge and insert a second louvre into an existing small window opening in the north-east corner of the private dining room. Louvres will be sized to match existing masonry apertures.

4. RELEVANT SITE HISTORY

Application Number	Proposal	Decision	Decision Date
91/0171	ALTERATIONS TO INTERNAL LAYOUT	Granted	05.04.1991
96/0026	LISTED BUILDING APPLICATION FOR INTERNAL ALTERATIONS	Granted	25.03.1996
96/0284	LISTED BUILDING APPLICATION FOR EXTENSION AND INTENAL ALTERATIONS	Granted	12.06.1996
96/0298	ALTERATIONS AND EXTENSIONS	Granted	17.05.1996
96/0682	ALTERATIONS TO EXISTING CAR PARK AND CONSTRUCTION OF ADDITIONAL CAR PARKING AREA	Granted with conditions	07.11.1996

97/0124	INTERNAL ALTERATIONS AND EXTERNAL WORKS	Granted with conditions	04.04.1997
97/0125	LISTED BUILDING APPLICATION FOR INTERNAL ALTERATIONS AND EXTERNAL WORKS	Granted with conditions	20.05.1997
96/1117	DEMOLITION OF DEFECTIVE STONE ARCH	Granted with conditions	14.07.1997
96/1118	APPLICATION FOR LISTED BUILDING CONSENT - DEMOLITION OF DEFECTIVE STONE ARCH	Granted with conditions	14.07.1997
99/0218	LISTED BUILDING CONSENT APPLICATION FOR DISPLAY OF HERITAGE TRAIL PLAQUE	Granted	26.08.1999
99/0911	RETENTION OF PIERS IN LIEU OF RECONSTRUCTING DEFECTIVE STONE ARCH NOW DEMOLISHED	Refused	22.10.1999
99/0912	LISTED BUILDING APPLICATION FOR RETENTION OF STONE PIERS	Refused	22.10.1999
00/0044	CONSERVATION AREA CONSENT APPLICATION FOR DEMOLITION OF BUNGALOW	Granted	13.03.2000
00/0436	LISTED BUILDING CONSENT APPLICATION FOR CONVERSION OF FUNCTION ROOM & BAR INTO A BEDROOM WITH EN-SUITE FACILITIES AND CONVERSION OF CHANGING ROOM INTO AN OFFICE	Granted	20.06.2000
01/0168	ERECTION OF REPLACEMENT STONE ARCH OVER ENTRANCE TO CAR PARK	Refused	26.03.2001
01/0177	LISTED BUILDING CONSENT APPLICATION FOR ERECTION OF REPLACEMENT STONE ARCH OVER ENTRANCE TO CAR PARK	Refused	26.03.2001
01/0587	ERECTION OF REPLACEMENT STONE ARCH OVER ENTRANCE TO CAR PARK (RESUBMISSION)	Refused	06.08.2001
01/0586	LISTED BUILDING CONSENT APPLICATION FOR ERECTION OF REPLACEMENT STONE ARCH OVER ENTRANCE TO CAR PARK (RESUBMISSION)	Refused	06.08.2001
01/1140	RESURFACING OF CAR PARK	Granted	12.12.2001
02/0724	LISTED BUILDING CONSENT FOR PROPOSED MODIFICATION TO REDUCE HEIGHT OF EXISTING KITCHEN EXTRACTION FAN AND DUCTING	Refused	13.08.2002
02/0725	PROPOSED MODIFICATION TO REDUCE HEIGHT OF EXISTING KITCHEN EXTRACTION FAN AND DUCTING	Refused	13.08.2002
02/1047	LISTED BUILDING CONSENT APPLICATION FOR ERECTION OF REPLACEMENT ARCH	Granted with conditions	05.11.2002
02/1255	LISTED BUILDING CONSENT FOR RAISING OF HEIGHT OF WALL	Refused	11.11.2002
02/1256	PROPOSED INCREASE IN HEIGHT OF EXISTING STONE WALL TO OBSCURE KITCHEN EXTRACTION FAN AND DUCT	Refused	11.11.2002
03/0051	LISTED BUILDING CONSENT APPLICATION FOR ALTERATIONS TO KITCHEN FAN DUCT AND INCREASE IN HEIGHT OF PARAPET WALL	Refused	19.03.2003

03/0052	INCREASE IN HEIGHT OF PARAPET WALL	Refused	19.03.2003
03/0564	ALTERATIONS TO KITCHEN FAN DUCT AND INCREASE IN HEIGHT OF PARAPET WALL	Granted with conditions	30.06.2003
03/0565	LISTED BUILDING CONSENT APPLICATION FOR ALTERATIONS TO KITCHEN FAN DUCT AND INCREASE IN HEIGHT OF PARAPET WALL	Granted with conditions	18.07.2003
22/1196	ADVERTISEMENT CONSENT FOR THE INSTALLATION OF A CAR PARK MANAGEMENT SYSTEM CONSISTING OF 9NO. NON- ILLUMINATED SIGNS	Refused	09.03.2023
22/1195	INSTALLATION OF A CAR PARK MANAGEMENT SYSTEM CONSISTING OF A COLUMN MOUNTED ANPR CAMERA AND CABINET	Refused	09.03.2023

5. LEGISLATIVE AND POLICY FRAMEWORK

5.1 HISTORIC ENVIRONMENT (WALES) ACT 2023

Section 96(2) of the Historic Environment (Wales) Act 2023 sets out that in considering whether to grant listed building consent, a planning authority must have special regard to the desirability of preserving— (a) the listed building to which the application relates, (b) the setting of the building, and (c) any features of special architectural or historic interest the building possesses.

5.2 The Development Plan comprises FUTURE WALES – THE NATIONAL PLAN 2040 and the NEWPORT LOCAL DEVELOPMENT PLAN (2011-2026), although by virtue of Section 70(2) of the Town and Country Planning Act 1990, there is no statutory requirement to have regard to the Development Plan in determining applications for Listed Building Consent.

5.3 THE NATIONAL DEVELOPMENT FRAMEWORK: FUTURE WALES - THE NATIONAL PLAN 2040

Future Wales sets out the Welsh Government's land use priorities and provides a national land use framework for SDPs and LDPs. Future Wales concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas that need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.

Policy 1 - Where Wales Will Grow

Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking

Policy 9 - Resilient Ecological Networks and Green Infrastructure

5.4 PLANNING POLICY WALES (EDITION 12) 2024

Planning Policy Wales (Edition 12) was revised and restructured in February 2024. Its primary objective is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.

PPW12 takes the seven Well-being Goals and the five Ways of Working as overarching themes and embodies a placemaking approach throughout, with the aim of delivering Active and Social Places, Productive and Enterprising Places and Distinctive and Natural Places. It also identifies the planning system as one of the main tools to create sustainable places, and

that placemaking principles are a tool to achieving this through both plan-making and the decision-making process.

Chapter 6 – *Distinctive and Natural Places: Recognising the Special Characteristics of Places (The Historic Environment)* - is of relevance to the assessment of this application, particularly:

The Welsh Government's specific objectives for the historic environment seek to:

- *Protect the Outstanding Universal Value of World Heritage Sites;*
- *Conserve archaeological remain, both for their own sake and for their role in education, leisure and the economy;*
- *safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;*
- *preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous;*
- *preserve the special interest of sites on the register of historic parks and gardens;*
- *protect areas on the register of historic landscapes in Wales. (para 6.1.6)*

There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the building, its setting or any features of special architectural or historic interest which it possesses (para. 6.1.10)

For listed buildings, the aim should be to find the best way to protect and enhance their special qualities, retaining them in sustainable use. The continuation or reinstatement of the original use should generally be the first option, but not all original uses will now be viable or appropriate. The application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building's survival or provide it with a sound economic future (para 6.1.11)

The demolition of any listed building should be considered as exceptional and require the strongest justification (para 6.1.12)

- 5.5 PPW12 is supported by a series of more detailed Technical Advice Notes (TANs), including TAN 24: The Historic Environment (May 2017).

Paragraph 5.13 of TAN 24 advises that when determining a listed building consent application, the local planning authority should consider the following issues:

- *The importance and grade of the building and its intrinsic architectural or historic interest.*
- *The physical features of the building which justify its listing and contribute to its significance, (for example its form and layout, materials, construction and detail) including any features of importance such as the interior, which may have come to light after the building's inclusion on the list.*
- *The contribution of curtilage and setting to the significance of the building, as well as its contribution to its local scene.*
- *The impact of the proposed works on the significance of the building.*
- *The extent to which the proposed works would bring substantial community benefits for example, by contributing to the area's economy or the enhancement of its local environment.*

It further advises that:

The listing grade may be a material consideration but is not in itself a reliable guide to the sensitivity of a building to alteration or extension. For example, many grade II buildings are humble, once common building types, listed precisely because they are relatively unaltered examples of their kind and their special interest can be damaged by inappropriate alteration or extension. (para 5.13)

Many listed buildings can sustain a degree of sensitive alteration and extension to accommodate continuing or new uses. Past changes that reflect the history of use and ownership may themselves be aspects of the special interest of the listed building. When applicants and the local planning authority assess the heritage values and significance of a listed building, which is the subject of a consent application, they must consider the sensitivity of that building to the proposed changes. Sustaining the special interest and significance of a listed building through the process of alteration, extension or re-use is exacting and should always be based on specialist knowledge and skill in order to realise the benefits that well-designed interventions can bring. (para 5.14)

5.6 Other relevant evidence or policy guidance includes:

- CADW, *Conservation Principles* (2011) and
- CADW, *Managing Change to Listed Buildings in Wales* (2017).

5.7 NEWPORT LOCAL DEVELOPMENT PLAN (2011-2026)

The Newport Local Development Plan 2011-2026 (adopted in January 2015) sets out the relevant planning policies at the local level. Insofar as heritage matters are concerned, the adopted plan aims under objective 5: *“To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment”*.

Thereafter, Strategic Policy SP9: *Conservation of the Natural, Historic and Built Environment* sets out the local authority’s approach, whereby:

“The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals.”

6. CONSULTATION RESPONSES

6.1 ENVIRONMENTAL HEALTH OFFICER:

6.1.1 *I refer to the above application passed to the Environmental Protection Team for comment. Have reviewed the submitted noise assessment and I confirm I have no objections to the proposed development as it will have very insignificant impacts on the environment or human health. However, the following condition should be attached to any permission granted:*

Fume Extraction – Maintenance

The extraction equipment shall be regularly maintained in order to ensure its continued satisfactory operation and the cooking process shall cease to operate if at any time the extraction equipment ceases to function to the satisfaction of the Local Planning authority.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected.

6.2 HENEB (FORMALLY GGAT):

6.2.1 *Thank you for consulting us about this application; consequently we have reviewed the detailed information contained on your website.*

We have consulted the regional Historic Environment Record and note that the proposal is located in an area of high archaeological potential, within the Newport Archaeologically Sensitive Area (ASA) and adjacent to the Caerleon Legionary Fortress: Area between Priory Hotel and Priory Lodge Scheduled Monument (Cadw ref. MM236) which comprises buried features and earthworks representing part of a Roman legionary fortress. The Priory Hotel is itself a Grade II Listed Building (Cadw ref. 2981). It is a building of apparently medieval and early 16th century origins, and some of the rubble walling seems to survive from then, but it was altered in the 17th and 18th centuries and its external appearance and all features are almost entirely early/mid 19th century and later. Its overall character is of a Tudor Revival of c1840 which has been overlaid by many changes made necessary by the upgrading of the building to a late 20th century hotel. It is said to have been built on the site of a Cistercian priory of probably 12th century date. It was a private house of the Morgan family from 1450 to 1835 and has been a hotel since the mid 20th century.

However, the current proposal is for the relocation and internalisation of existing kitchen extraction. The works are relatively limited in scale and overall, it is unlikely that archaeologically significant material will be encountered during the course of the proposed works.

As a result, there is unlikely to be an archaeological restraint to this proposed development and consequently, as the archaeological advisors to your Members, we have no objections to the positive determination of this application. The record is not definitive, however, and features may be disturbed during the course of the work. In this event, please contact this division of the Trust.

If you have any questions or require further advice on this matter please do not hesitate to contact us.

6.3 AMENITY SOCIETIES:

6.3.1 No Response.

6.4 ROYAL COMMISSION FOR ANCIENT MONUMENTS WALES:

6.4.1 No response.

6.5 PRINCIPAL HERITAGE OFFICER:

6.5.1 This application has been fully considered by the Principal Heritage Officer, as author of this report.

7. PUBLIC REPRESENTATIONS

7.1 A site notice was displayed, and a Press Notice was published. No responses were received.

8. ASSESSMENT

8.1 Section 96(2) of the Historic Environment (Wales) Act 2023 requires the Local Planning Authority in considering applications for Listed Building Consent to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The supplied Heritage Impact Statement (HIS) is thorough, demonstrating that full consideration has been given to the significance of this Grade II listed building, and that the design process has sought to minimise harm while addressing the practical requirements of the site. The proposed approach, internalisation of the extraction system, is considered proportionate and sensitive to the building's special interest, leaving the system unseen within key external views of the listed asset.

It is acknowledged that the works will involve some internal intrusion. However, this impact is limited in extent, being confined to an area of relatively low significance (already subject to modern alteration), has the benefit of future reversibility, and does not impact unduly upon features or fabric of special architectural or historic interest. Of note, it has now been satisfactorily demonstrated (via further investigatory work) that the ground floor ceiling impacted by these works is of modern plasterboard construction, that existing floorboards comprise of modern fabric, and that the floor joists (which are of some historic interest) shall remain unimpacted by the carefully revised design. Thus, there are no structural concerns with regards to the proposed floor penetration.

Externally, the system is proposed to vent via modern louvres set within existing apertures (door and window) to the south-eastern elevation. Inevitable loss of the existing joinery is mitigated by the modern nature of the existing fire escape door and evident previous alteration of the existing window.

Overall, resultant visual impact will be low, as the area of south-eastern elevation proposed for alteration is unseen within principal views of the asset. In addition, the new louvres are to be dark-finished and will be as recessed as practicable within the existing masonry openings (as shown within Drawing TPC-DT-00-008, dated 27/01/26).

All fixings into the historic masonry will be formed in stainless steel, to prevent any possibility of future corrosion and 'rust-jacking'.¹

The resultant harm is limited in nature and, on balance, offer a positive outcome by preserving primary significant characteristics of the building and supporting its continued viable use as a restaurant and hotel.

It should be noted here that, due to the requirements of Listed Building Enforcement Notice served on 03/04/2025 (under E25/0046), removal of and make-good to the existing unauthorised work are covered by said notice, which shall remain in force until all works have been satisfactorily completed.

In reference to the response received from the Environmental Health Officer, it should also be noted that regular maintenance of the proposed extraction equipment (to prevent impact upon the amenity of occupiers of other premises in the vicinity) is beyond the scope of listed building control. However, any such issues may be dealt with by said officers should they arise in the future and, consequently, the suggested condition has been added to this report as an informative only.

9. CONCLUSION

- 9.1 Section 96(2) of the Historic Environment (Wales) Act 2023 sets out that in considering whether to grant listed building consent, a planning authority must have special regard to the desirability of preserving— (a) the listed building to which the application relates, (b) the setting of the building, and (c) any features of special architectural or historic interest the building possesses.

Having regard to the Local Planning Authority's statutory duties it is considered that the special interest of the building would be preserved. Accordingly, it is recommended that Listed Building Consent be granted, subject to conditions.

This conclusion is consistent with the advice received from a named Building Conservation Officer with the appropriate Cadw LBC delegation: *G. Arnall*.

10. DECISION

GRANTED WITH CONDITIONS

CONDITIONS:

1. The development shall be implemented in accordance with the following plans and documents:
 - Site Location plan: *The Priory Hotel, Caerleon, Newport, NP18 1AG*. Received by the Local Authority on 14/10/25.
 - *Extraction Equipment Existing Location Plan*, 20/09/25.
 - *Extraction Equipment Existing Location References*, 20/09/25.
 - *Extraction Equipment Proposed Location References*, 20/09/25.
 - *Planning Statement, The Priory Caerleon, Prepared by LRM Planning Limited on behalf of The Priory*. Dated October 2025.
 - *The Priory, Caerleon. Heritage Impact Statement. Prepared by The Environmental Dimension Partnership Ltd On behalf of Caerleon Hotels Ltd*. Report Reference: edp9277_r001a. Dated October 2025.
 - Drawing No: TPC-GA-00-001. *Ground Floor Vent Layout*. Date: 27/01/26.
 - Drawing No: TPC-EL-00-003. *Elevations & 3D Visual*. Date: 27/01/26.
 - Drawing No: TPC-ES-00-004. *Equipment Schedule*. Date: 27/01/26.
 - Drawing No: TPC-SS-00-005. *Services Schematic*. Date: 27/01/26.
 - Drawing No: TPC-BW-00-006. *Builders Work & Setting Out*. Date: 27/01/26.

¹ Rust jacking is the destructive expansion of iron or steel as it corrodes

- Drawing No: TPC-MF-00-007. *Manufacture - Main Canopy*. Date: 27/01/26.
- *Updated Extract System at The Priory Hotel & Restaurant, Caerleon. Noise Assessment for Planning Application*. 14th July 2025.
- *Soler and Palau* product specification Sheets for *TCBBx2* and *TCBTx2* Series. Received by the Local Authority on 14/10/25.
- *Systemair* product specification Sheet for *MUBT 062 630D4 IE2 Item no. 33660*. Received by the Local Authority on 14/10/25.
- 2026-01-21 Supporting Information - Floor Investigation Works.

Reason: In the interests of clarity and to ensure the development complies with the submitted plans and documents upon which this decision was based.

2. As part of the installation hereby approved, no 'hot works' (defined as any activity or process that generates a source of ignition through a flame, heat or a spark and including cutting, welding, brazing, soldering, hot air, the use of blow-lamps and other equipment producing heat or naked flames, and lighting fires in hearths) shall be carried out within the listed building.

Reason: To ensure that due regard is paid to protecting the special architectural and historic interest and integrity of the building in accordance with Section 96(2) of the Historic Environment (Wales) Act 2023 and Policy SP9 of the Newport Local Development Plan 2011 – 2026.

INFORMATIVES:

1. During the works, if any hidden historic features of significance are revealed, they should be retained in-situ. Works shall be halted in the relevant area of the building, and the Local Planning Authority should be notified immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed.
2. The extraction equipment shall be regularly maintained to ensure its continued satisfactory operation and the cooking process shall cease to operate if at any time the extraction equipment ceases to function to the satisfaction of the Local Planning authority.
3. Section 96 of the Historic Environment (Wales) Act 2023 was relevant to the determination of this application. The development plan for Newport is the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). Policy SP9 was relevant to the determination of this application.
4. Due to the minor nature of the proposed development (including any demolition) and the location of the proposed development, it is considered that the proposals did not need to be screened under the Environmental Impact Assessment Regulations.