

Brinkworth, Emma (Planning Officer)

From: Arnall, Guy
Sent: 08 September 2025 13:48
To: Brinkworth, Emma (Planning Officer)
Subject: FW: Planning Consultation Request for case ref: 25/0536 (13 Caerau Crescent Newport NP20 4HG) (FULL)

Hi Emma

Re: REPLACEMENT OF EXISTING WINDOWS WITH UPVC CASEMENT WINDOWS AND CREATION OF ADDITIONAL WINDOW OPENING IN SIDE ELEVATION

1. Legislation, Policy, and Guidance

The Historic Environment (Wales) Act 2023 (HEWA 2023) came into force 4th November 2024 and repeals the previous legislative framework for the protection of the Historic Environment in Wales, including the Planning (Listed Buildings and Conservation Areas) Act 1990. In respect of Conservation Areas, Section 160 of the HEWA 2023 imposes the general duty (derived from Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that:

"In exercising a planning function in relation to a building or other land in a conservation area, a person must have special regard to the desirability of preserving or enhancing the character or appearance of that area".

Planning Policy Wales (Edition 12, 2024) states that:

"6.1.14 There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings.

6.1.15 There is a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character or appearance of a conservation area or its setting to an unacceptable level. In exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds."

Policy CE7 of Newport Local Development Plan 2011 – 2026, January 2015 states that:

"DEVELOPMENT WITHIN OR ADJACENT TO CONSERVATION AREAS WILL BE REQUIRED TO:
i) BE DESIGNED TO PRESERVE OR ENHANCE THE CHARACTER OR APPEARANCE OF THE CONSERVATION AREA, HAVING REGARD TO THE CONSERVATION AREA APPRAISAL WHERE APPROPRIATE.
ii) AVOID THE REMOVAL OF EXISTING HISTORIC FEATURES, INCLUDING TRADITIONAL SHOPFRONTS AND JOINERY.
iii) USE MATERIALS WHICH ARE TRADITIONAL, OR APPROPRIATE TO THEIR CONTEXT.
iv) COMPLEMENT OR REFLECT THE ARCHITECTURAL QUALITIES OF NEARBY BUILDINGS WHICH MAKE A POSITIVE CONTRIBUTION TO THE CHARACTER OF THE AREA.
v) PAY SPECIAL ATTENTION TO THE SETTINGS OF BUILDINGS, AND AVOID THE LOSS OF ANY EXISTING DOMESTIC GARDENS AND OPEN SPACES WHICH CONTRIBUTE TO THE CHARACTER OF THE AREA.
vi) AVOID ADVERSE IMPACT ON ANY SIGNIFICANT VIEWS, WITHIN, TOWARDS AND OUTWARDS FROM THE CONSERVATION AREA."

13 Caerau Crescent is a property within Stow Park Conservation Area (CA). There is an Article 4(2) Direction within the CA restricting (amongst other items), 'Permitted Development' (PD) for: 'Removal, renewal or alteration of

doors, door frames, windows and window frames, set within external walls of dwelling houses... Insofar as any such development referred to above would front onto a highway or open space."

As identified within the Stow Park CAA:

"3.6.3 Although the architectural styles throughout the Conservation Area vary from building to building, there is a common palette of characteristic features. This includes:

- Prominent gable ends;*
- Tall chimneystacks;*
- Hung tiles;*
- Canted or squared bays, and turrets;*
- Large windows, often with smaller lights in the upper pane;*
- Half timbering;*
- Barge boards;*
- Ridge tiles; and*
- Sculpted detailing such as date stones"*

The same document goes on to state that:

"4.3.7

..Replacement uPVC windows which have many uncharacteristic features compared to original timber units (false glazing bars, thicker frames and different opening mechanisms) and detract from the architectural value of the buildings and streetscape. They can also be detrimental to the condition of historic buildings.

5.2.6

uPVC is an inappropriate and harmful material for historic buildings: it can damage their condition and detract from their character. Traditional joinery items such as windows and front doors should be kept and repaired wherever possible or replaced with traditionally designed timber alternative where the original has deteriorated beyond repair. The use of timber also offers sustainability benefits over uPVC units which cannot be easily recycled.

Understanding 'Like-For-Like'

A term frequently used in conservation is 'like-for-like' replacement or repair. This is frequently – and mistakenly – taken to mean that a modern alternative that generally echoes the style of the element removed is acceptable. However, this is not accurate or acceptable. Like-for-like should always be interpreted as an alternative that matches the historic element removed in terms of its material, dimensions, method of construction, finish, means of installation and any other feature specific to the original element, such that the modern replacement is hardly discernible from the original (accepting that its condition will be greatly improved where the original has failed beyond repair).

For example, modern uPVC windows in imitation of Victorian-style sash windows but with false glazing bars and top-hung casement opening mechanism do not constitute a like-for-like replacement for the traditional timber-framed Victorian sliding sash windows, although they appear to look similar stylistically."

2. Analysis

13 Caerau Crescent is prominent within the streetscape, particularly where its unusual second-floor faceted oriel window fronts views within the south-westly approach. Despite some negative existing alterations (render to the prominent end elevation and loss of timber sash windows to both the oriel window at second floor and the ground floor windows adjacent to the canted bay), its rich polychromatic brickwork, highly-expressive form and its surviving timber sliding sash windows (some with typical, multiple upper-lights) all make a very positive contribution towards the character and appearance of the building - and therefore the wider conservation area. Thus, it is specifically identified as a positive contributor towards the CAA.

This application proposes replacement of all windows to the building. As the property is a Dwellinghouse, PD rights are restricted for windows to the front elevation only.

Window 1

The existing is a characterful, white-painted timber sliding-sash window featuring an asymmetric eight-over-four pane arrangement and ornate 'horns', all in the 'Queen-Anne Revival' style. As such, it makes a very positive contribution towards the character and appearance of the building - and therefore the wider conservation area. It is proposed to replace the existing with a 50-50 split uPVC window, featuring a 15-over-two arrangement, with two side-opening casements to the lower half. This proposed would entirely alter the character of the existing window, including its traditional arrangement, materials and means opening. It would be considered an alteration which is harmful to character and appearance.

Window 2

Existing windows to the first-floor oriel are formed in white-painted timber, set behind ornately moulded stone transoms and mullions. There are fixed timber lights to the centre, with flush-closing side-hung casements to the lower sides and top-hung casements to the upper sides. Though it is likely these windows were all once timber sliding-sash windows (which ran behind the ornate stonework), their existing material and arrangement maintains some of the appearance of timber sliding sashes.

It is proposed to replace the existing with face-closing casement windows in uPVC. This would be a material change from traditional timber which would also increase the visible margins of the side-hung windows, resulting in a non-uniform and modern appearance, which would result in negative impact upon existing character and appearance.

Windows 3 & 4

The existing are modern metal-framed windows, split horizontally into three uneven panes. It is proposed to replace the existing with a 50-50 split uPVC window, featuring a 15-over-two arrangement, with two side-opening casements to the lower half. This would result in some enhancement to existing character and appearance.

Window 5

The existing is a timber window with upper top-hung face-closing casement which still retains the basic form of the original asymmetric sash division to the upper floor windows. It is proposed to replace the existing with a 50-50 split uPVC window, featuring a 15-over-two arrangement, with top-opening and face-closing casement to the lower half. This would be a material change from traditional timber fabric, which would maintain the top-hung opening but eliminate the surviving asymmetric division. On balance, this alteration would result in neutral impact upon existing character and appearance.

Window 6

The existing is a characterful, white-painted timber sliding-sash window with an asymmetric five-over-two pane arrangement, ornate 'horns' and moulded meeting rail, all in the 'Queen-Anne Revival' style. It is proposed to replace the existing with a 50-50 split uPVC window, featuring a 15-over-two arrangement, with top-opening and face-closing casement to the lower half. This proposed change would entirely alter the character of the window, including its traditional arrangement, materials and means opening. It would be considered an alteration which is harmful to character and appearance.

Window 7

The three windows to this ground floor bay are characterful, white-painted timber sliding-sash windows with an asymmetric one-over-one pane arrangement, ornate 'horns' and moulded meeting rails. It is proposed to replace the existing with 50-50 split uPVC windows, featuring a 15-over-two arrangement, with top-opening and face-closing casement to the lower half. This proposed change would entirely alter the character of the window, including its traditional arrangement, materials and means opening. It would be considered an alteration which is harmful to character and appearance.

The remaining windows do not front the highway (or an open space) and are not under our control.

3. Conclusion

The supplied HIA concludes that:

The new windows will improve the appearance of the building and provide a return to a traditional aesthetic. The new windows will also provide a substantial improvement in energy efficiency to the property.

- *Owners are keen to return the property closer to its original appearance externally and internally;*
- *Wooden sliding sash windows are cost prohibitive and do not offer long term ease of maintenance benefits;*
- *Wooden sliding sash windows are single glazed which do not offer improved energy efficiency advantages;*
- *UPVC options offer the appearance, energy efficiency and maintenance requirements as outlined in the objective.*

Whilst it is agreed that there would be some benefit gained from unification of window design to the front elevation of this building (including particular benefit from the replacement of Windows 3 and 4), overall, it is considered that these proposals would result in harm to the character and appearance of Stow Park Conservation Area, contrary to Section 160 of the HEWA 2023, PPW Edition 12, and Policy CE7 of Newport Local Development Plan.

I would also note here that it is possible to manufacture timber windows from very stable and long-lasting acetylated timber, which can incorporate slimline vacuum or gas-filled double-glazed units (with perimeter seals/spacers coloured to match the painted finish), which have much improved u-values over single glazing. In addition, Approved Document L explicitly states that work to buildings within a conservation area does not need to comply fully with energy efficiency requirements where to do so would unacceptably alter the dwelling's character or appearance.

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

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

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

Sent: 02 September 2025 12:08

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

Subject: Planning Consultation Request for case ref: 25/0536

Dear Principal Heritage Officer

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

App Number: 25/0536

Address: 13 Caerau Crescent Newport NP20 4HG

Proposal: REPLACEMENT OF EXISTING WINDOWS WITH UPVC CASEMENT WINDOWS AND CREATION OF ADDITIONAL WINDOW OPENING IN SIDE ELEVATION

submitted on 8 July 2025.

View details of 25/0536 at Newport Council - Planning Online:

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpublicaccess.newport.gov.uk%2Fonline-applications%2Fplan%2F25%2F0536&data=05%7C02%7CGuy.Arnall%40newport.gov.uk%7Ceaf8b73c0842453c409e08ddea10ec68%7C2c4d0079c52c4bb3b3cad8eaf1b6b7d5%7C0%7C0%7C638924080896031524%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIsIlAiOiJXaW4zMilslkFOljoitWFrpbGlzIdUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=b00cmhdQXeMhc0OUb0Eam16SyYiF0GtCCgeApREv%2FNw%3D&reserved=0>

Your sincerely
Development Management