

From: Alison Edwards <alisonedwards@archaeologyuk.org>

Sent: 13 August 2025 13:30

To: NCC - Planning <Planning@newport.gov.uk>

Subject: 164 Commercial Street, Newport, NP20 1JN. Application no. 25/0553

FAO Emma Brinkworth, Planning Case Officer

Dear Emma,

Thank you for notifying the Council for British Archaeology (CBA) of this application for Listed Building Consent.

164 Commercial Street is a Grade II listed building which dates back to the eighteenth century. Its historic fabric and classical frontage have architectural and evidential value, and make a positive contribution to the Newport town centre Conservation Area.

This application lacks a detailed Heritage Statement which assesses the significance and age of the fabric affected and describes the proposed works and their impacts. As such, it does not meet the requirements of Planning Policy Wales para. 6.1.13.

Based on the photos of the building before and after the works, the retrospective works comprise the following:

- Removal of the square windows with decorative detailing and surround, and replacement with larger modern glass windows with a lower stall riser.
- Possible removal of the neoclassical pilasters (difficult to establish from the photographs).
- Insertion of a new canopy.
- Repainting of the frontage black.

The classical detailing of the front window was mentioned in the listing and appears to be historic. The changes undertaken have resulted in the loss of the external historic character of the building at the street level, clearly negatively impacting the building's historic, architectural, and communal values, and negatively impacting the character and appearance of the conservation area. At a ground floor, the building now appears externally as entirely modern, with no legible classical features.

Under Section 117(1) of the Historic Environment (Wales) Act 2023, it is a criminal offence to undertake works to a listed building without the required permissions. This protection exists to ensure that harmful works are not undertaken without justification and to protect nationally significant heritage.

The CBA are of the opinion that the proposed (undertaken) works do not meet the requirements of paras. 6.10 and 6.11 of Planning Policy Wales, as it they have resulted in the loss of 'features of special architectural or historic interest' on the listed building and have not protected or enhanced its special qualities. We do not consider that this application would have been

granted permission if it had been applied for prior to works being undertaken; this is evidenced by the withdrawal of a previous application (05/1586) for the replacement of the shop front.

We urge your local authority to refuse retrospective permission for these harmful alterations and require the owners to restore the historic character of the listed building. Permitting these alterations would undermine the system of listed building consent and fail to safeguard the significance of the building and the wider townscape.

I trust these comments are useful to you; please keep the CBA informed of any developments with the application. We would be grateful if our comments could be uploaded to the planning portal.

Kind Regards,

Dr Alison Edwards
Listed Buildings Caseworker

The Council for British Archaeology (CBA) was established in 1944 and is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in **Regulation 9 (Notification to the Amenity Societies and the Royal Commission on the Ancient and Historical Monuments of Wales, 2024) of the Historic Environment (Wales) Act**.

Alison Edwards

[she/her]

Listed Building Caseworker /
JCNAS database
coordinator

***Please note my normal
working days are Monday-
Thursday***

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