

Brinkworth, Emma (Planning Officer)

From: Arnall, Guy
Sent: 31 July 2025 16:28
To: Brinkworth, Emma (Planning Officer)
Subject: RE: Planning Consultation Request for case ref: 25/0563 (164 Commercial Street Newport NP20 1JN) (Listed Building Consent)

Hi Emma

Please supersede my previous comments for 25/0563 with the below.

1. Legislative and Policy Framework

Section 96 of the Historic Environment Wales Act 2023 states that:

(1) On determining an application for listed building consent, a planning authority or the Welsh Ministers may grant or refuse consent.

(2) In considering whether to grant listed building consent, a planning authority or the Welsh Ministers 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.

(3) Listed building consent has effect for the benefit of the listed building and the land on which it is situated, and of all persons for the time being interested in the building and land; but this is subject to the terms of the consent.

Section 4 of The Listed Buildings and Conservation Areas (Procedure and Interest Rate) (Wales) Regulations 2024 states that:

4.—(1) An application for listed building consent must include with it a statement referred to as a heritage impact statement.

(2) A heritage impact statement must—

(a) describe the special architectural or historic interest of the listed building to which the application relates and its significance, with particular reference to the part of the listed building affected by the works,

(b) explain the objective that the works are intended to achieve and why they are desirable or necessary,

(c) include a summary of the options considered for the purpose of achieving the objective in sub-paragraph (b) and the reasons why the proposals to which the application relates are preferred,

(d) describe the works and the design principles which have been applied to them,

(e)include a schedule of works,

(f)describe how the works will affect the character of the listed building as a building of special architectural or historic interest, including an assessment of the impact of the works on the significance of the building, and

(g)describe how issues relating to access to, or in, the listed building have been dealt with, but excluding issues relating to access to, or in, any part of a listed building which is used as a private dwelling.

The primary objective of Planning Policy Wales (Edition 12, February 2024) 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 relevant to the assessment of this application, in particular the following statements:

The Welsh Government's specific objectives for the historic environment seek to...safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved and...preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous; (para 6.1.6)

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 (6.1.11).

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

Applicants for listed building consent must be able to justify their proposals, show why the alteration or demolition of a listed building is desirable or necessary and consider the impact of any change upon its significance. This must be included in a heritage impact statement, which will be proportionate both to the significance of the building and to the degree of change proposed (6.1.13)

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

Paragraph 5.13 of TAN24 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).

Other relevant evidence or policy guidance include:

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

Newport's Supplementary Guidance for Shopfronts and Security Measures for Shopfronts is referenced, where applicable, as part of the analysis below.

2. Analysis

According to our SHOPFRONT DESIGN SUPPLEMENTARY PLANNING GUIDANCE, October 2021:

3.7 Almost all advertisements on listed buildings will constitute an alteration to the building and therefore require listed building consent in addition to any advertisement consent. Special care is essential to ensure that any advertisement displayed on, or close to, a listed building does not detract from the integrity of the building's design, historical character or structure, and does not spoil or compromise its setting.

4. General Design Principles

4.1. The established principles of successful shopfront design have their foundations in Victorian and Edwardian architecture, which make up the majority of the City Centre, but can be applied successfully to any type of building. A well-designed shopfront should be in keeping with the style and character of the building which frames it, as well as the historic character of the area in which it is located.

4.2. Any future amendments to shop fronts in or near the Conservation Area should broadly seek to reinstate the elements present in historic shopfronts and basic proportions.

4.3. The following design principles apply to changes to all existing and new shopfronts, and forms the structure to this guidance document.

a. Respond to the context

Create unity and cohesion in the street scene by creating shopfronts that sit within the building - maintaining the scale, proportion, and rhythm of the building above.

b. Conserving and enhancing character

Enhancement of original architectural features, rather than hide or detract from them. Developments in the Conservation Area should pay particular attention to preserving and enhancing the character and appearance of the area.

c. Signage and fascias should not be overbearing or over-sized

Careful attention to the scale of the fascia, lettering, lighting, additional advertising having a negative impact on the street scene. Signage should be professionally installed.

d. Incorporate security features, canopies, lighting and other additional building elements into overall design. Additional elements should be incorporated into the building design and not have a negative impact on the street scene.

e. Access for all

Doorways and entrances should be obvious and accessible to people with disabilities.

9.1.1 The fascia is a horizontal band, situated vertically under the edge of a roof displaying the shop title or name. The scale and position of the fascia sign is crucial to the advertisement of the company as well as its contribution to the aesthetics of the building and overall streetscape.

9.1.2 The fascia should not dominate the facade. Special consideration should be given to the scale, materials, colour, lettering and illumination of the fascia sign to ensure it fits with the building and the street.

9.1.5 Fascias should be no deeper than 20% of the shopfront's overall height. Fascias should not obscure, damage or project in front of visually significant architectural details, including first floor window cills.

9.1.7 In Conservation Areas, all fascias should be finished by a well-defined cornice. Corbels can be plain or highly decorative and are encouraged to add a design feature to the shop front.

9.2.2 Signs should not be excessively large and should relate to the pedestrian users of the street. Box fascias should be avoided. Lettering and graphics should be moderately sized and in proportion to the fascia. Clear, well spaced letters are just as easy to read as larger oversized letters.

9.2.3 The sign should be limited to the name of the shop with a simple graphic logo and the street number. Too much information which creates visual clutter will not be acceptable.

9.2.7 Avoid putting additional signs onto storeys above the shop. Large external banners and advertising posters should not be hung from upper storeys.

9.2.11 Projecting box signs are generally not acceptable.

Design Note 9

Retention or maintenance of an existing traditional fascia is encouraged. New fascias should not be placed over existing boards.

Design Note 10

In Conservation Areas and listed buildings original cornices and corbels should be maintained, restored or reinstated.

This application proposes the installation of 'Internally Illuminated projecting signs in Aluminium Composite Tray Panels, with White Letters and full colour images.'

appears to be clear discrepancy between proposed side elevations (Drawings 164CS-1807-PE/E/PRSE & 164CS-1807-PE/E/PLSE) and the Proposed Fascia Section Through (X-X) @1:10. Therefore, insufficient detail or analysis has been provided in order to demonstrate that the special interest of the asset will be preserved by its installation, contrary to Section 4 of The Listed Buildings and Conservation Areas (Procedure and Interest Rate) (Wales) Regulations 2024.

Irrespective of this, I could not support the proposed signage. It is contrary to the above guidance; consisting of a large, illuminated box fascia which would negatively amend the existing traditionally arranged and positively contributing shopfront arrangement, thus detracting from both the significance of the listed asset and the character and appearance of the conservation area.

There is also further, large and illuminated box signage proposed above fascia level, where it would intrude prominently into the fine upper storey of the listed building. This aspect of the proposal would also not be considered to preserve or enhance the special interest of either the listed asset, serving only to distract further from its fine elevation.

The signage also proposes to incorporate fully illuminated images, which would create further visual clutter and distraction. And thus, further harm.

Alterations to doorway, shopfront facade and the addition of a canopy have been addressed within the associated LBC (25/0553) and FULL (25/0552) application responses.

3. Conclusion

These proposals are harmful to the special architectural interest of the listed asset, contrary to Section 96 of the Historic Environment Wales Act 2023, Planning Policy Wales (Edition 11), Policy Guidance including Technical Advice Note 24: The Historic Environment, and Newport Council's Supplementary Planning Guidance.

As it stands, this application should be refused, with no need to notify Cadw.

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: 24 July 2025 13:00

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

Subject: Planning Consultation Request for case ref: 25/0563

Dear Principal Heritage Officer

Please find attached correspondence from Newport Council with regards to the above planning application submitted on 15 July 2025.

Your sincerely
Development Management