

Brinkworth, Emma (Planning Officer)

From: Arnall, Guy
Sent: 08 January 2026 13:49
To: Brinkworth, Emma (Planning Officer)
Subject: RE: Planning Consultation Request for case ref: 25/1105 (Iglesia Ni Cristo Llanthewy Road Newport NP20 4LA) (LBC)

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Emma

Re: LISTED BUILDING CONSENT FOR EXTERNAL LIGHTING, NAMEPLATE, CCTV CAMERAS, SECURITY BOXES, AIR CONDITIONING UNITS DRILLING INTO MORTAR, MORTAR FIXING, EXTERNAL UNIT PLACEMENT, STONE REMOVAL AND STONE REPLACEMENT

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.

The 'special regard' duty has previously been tested in the Court of Appeal in terms of the Planning (Listed Buildings and Conservation Areas) Act (1990), wherein '[Barnwell Manor](#)' confirmed that "considerable importance and weight" should be afforded by the decision maker to the desirability of preserving a listed building along with its setting.

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).

Section 5 of TAN 24 covers listed buildings, with paragraph 5.9 setting out the following in respect of the need for LBC:

“The Planning (Listed Buildings and Conservation Areas) Act 1990 requires any works of demolition, alteration and/or extension which would affect the character of a listed building to be authorised through the process of listed building consent. It is a criminal offence to carry out such works without consent, which should be sought from the local planning authority. When considering any applications for listed building consent, the local planning authority or the Welsh Ministers must 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. Consent is not normally required for repairs, unless they involve changes that would affect the character of the listed building.”

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)
- Cadw, *Heritage Impact Assessment in Wales* (2017)

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 sets out objective 5

that is “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 in this respect:

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

2. Observations

The former Llanthwy Road Baptist Church (and attached Sunday School wing) was built 1912, to the designs of renowned architects Habershon and Fawckner. This large chapel, in Anglican Style, is prominently located upon a corner site within a principally residential area. The asset was afforded Grade II Listed protection “...as a chapel building of imposing design by a well known regional architectural partnership.”

Whilst the accompanying HIA/S provides information upon the history of the asset, there is very little detail of the proposed works provided and no analysis of their impact upon significance. This is contrary to legislation and guidance.

Upon this basis, I would suggest that the LBC application be withdrawn (or simply refused) pending assessment undertaken by a suitably-qualified specialist which fulfils Cadw guidance on the heritage impact assessment process, as outlined within Cadw’s [Heritage Impact Assessment in Wales 2017](#). The abovementioned guidance states that:

“Your heritage impact assessment should take into account sufficient information to enable both the significance of the asset and the impact of change to be understood. It should be proportionate both to the significance of the historic asset and to the degree of change proposed.”

The agent should note the *minimum* requirements at paragraph 7.1 and copied below:

- *a description of your proposed work, including the design principles and concepts, and a schedule of works, with reference to any photographs, plans and drawings that support your consent application*
- *your reasoning for the proposed works, which explains what you intend to achieve and why the works are desirable or necessary*
- *a brief description of the special architectural or historic interest of your listed building and an assessment of its significance, with particular emphasis on those aspects that will be affected by your proposals*
- *an assessment of the impact of the proposed work on the special architectural or historic interest of your listed building and its significance, including potential benefits and any harm*
- *a summary of your options and the reasons for your preferred approach.*

Please note this guidance is sourced from the statutory Listed Buildings and Conservation Areas (Procedure and Interest Rate) (Wales) Regulations 2024, which also state 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.

With regard to the application submitted, the supplied HIA/S is regarded as insufficient to support extensive alterations to a Grade II Listed asset and has failed to clearly demonstrate that the Architectural and Historic Interest of the asset will not be unduly harmed because of the works proposed.

Notwithstanding the lack of justification outlined above, I have several specific comments regarding this proposal as it stands.

External Signage

As far as I can discern from the planning history for this Grade II Listed asset, a retrospective Advertisement Consent Application was made for the 'seals' to gables upon south and east elevations of the building under 12/0834.

"Individually fixed stainless steel lettering 200mm tall with 250mm clear between lines projecting max. 150mm from face of wall" were also proposed to be attached to the east and south faces of the tower at this time.

The Heritage Officer recommended:

"The church seals can be seen in place, and in my opinion relate well to the building as a whole. Similarly, though the lettering has not yet been installed, their scale and location seem appropriate in the context of this large early 20th century church building. The works will require listed building consent, but the limited impact on the character of the building seems justified to retain it in ecclesiastical use, and as such I see no reason why such an application should not be granted subject to clearer details being submitted to show the precise construction of the proposed lettering."

I cannot see that an LBC application was ever made for these, though the seal roundel to the south elevation featured within elevation drawings submitted as part of LBC application 24/0715 and therefore could be deemed consented by virtue of this application.

From the information provided, I would conclude that, as proposed, the nameplate is over-sized and visually intrusive, impacting negatively upon the arch and hood-moulding detail of the large south-eastern window (and therefore the aesthetic interest of the Grade II Listed asset).

Other Items

- Though locations are indicated on large scale drawings, no details of proposed external lighting – or their precise locations, meaning of fixing, or servicing routes (cables etc) - have been supplied. These details would be required upfront, to assess their potential impact upon special interest.
- Though locations are indicated on large scale drawings, no details of proposed CCTV cameras – or their precise locations, or servicing routes (cables etc) - have been supplied. These details would be required upfront, to assess their potential impact upon special interest.
- Though locations are indicated on large scale drawings, no details of proposed Air conditioning/heating units – or their precise locations internally and externally - have been supplied. These details would be required upfront, to assess their potential impact upon special interest.

3. Reasons for refusal

- The proposed signage would be very prominent and visually obstructive upon the principal elevation of the building. As such it would result in harm to its special architectural and historic interest. The proposal therefore fails to satisfy the requirements of current legislation s96 of the 2023 Historic Environment Wales

Act, national planning policy detailed in Planning Policy Wales and TAN 24, and Policy SP9 of The Newport Local Development Plan 2011-2026 (adopted in January 2015).

- In the opinion of the Local Planning Authority the application is insufficiently detailed regarding the significance, proposed works and the impact of said works upon *The Former Llanthewy Road Baptist Church (and attached Sunday School wing)*, a Grade II Listed Building. As such, the applicant has failed to demonstrate that the development would not cause harm to its special architectural and historic interest. The proposal therefore fails to satisfy the requirements of current legislation s90(2) of the 2023 Historic Environment Wales Act, national planning policy detailed in Planning Policy Wales and TAN 24, and Policy SP9 of The Newport Local Development Plan 2011-2026 (adopted in January 2015).

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: 07 January 2026 14:31

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

Subject: Planning Consultation Request for case ref: 25/1105

Dear Principal Heritage Officer

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

App Number: 25/1105

Address: Iglesia Ni Cristo Llanthewy Road Newport NP20 4LA

Proposal: LISTED BUILDING CONSENT FOR EXTERNAL LIGHTING, NAMEPLATE, CCTV CAMERAS, SECURITY BOXES, AIR CONDITIONING UNITS DRILLING INTO MORTAR, MORTAR FIXING, EXTERNAL UNIT PLACEMENT, STONE REMOVAL AND STONE REPLACEMENT

submitted on 27 December 2025.

View details of 25/1105 at Newport Council - Planning Online:

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpublicaccess.newport.gov.uk%2Fonline-applications%2Fplan%2F25%2F1105&data=05%7C02%7CGuy.Arnall%40newport.gov.uk%7Cec00d9dd9127439790df08de4df96e12%7C2c4d0079c52c4bb3b3cad8eaf1b6b7d5%7C0%7C0%7C639033930994521100%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMtIkskFOljoITWFpbClldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=NhyXLXQSp4a0mamGG05ellgVkbfsSEsbMHdDkQY0U8%3D&reserved=0>

Your sincerely
Development Management