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Sent: 10 July 2026 10:56

To: Hawkins, Grant (Principal Planning Officer) <Grant.Hawkins@newport.gov.uk>

Subject: RE: Planning Consultation Request for case ref: 26/0381 (6 Stow Park Circle Newport NP20 4HE) (FULL)

Hi Grant

Re: INTERNAL ALTERATIONS TO LARGE DWELLING, TO FORM 7NO FLATS AND 1NO. SINGLE DWELLING, WITH ASSOCIATED OFFROAD PARKING, LANDSCAPING AND BIKE / BIN STORAGE

1. Legislation, Policy, and Guidance

S160(1) of the Historic Environment (Wales) Act 2023 requires 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.”*

A reasonable reading of this part of the legislation being that *“special regard”* for Conservation Areas (CAs) should be interpreted in the same way as for listed buildings (see per Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council & Others [2014] EWCA Civ 137) i.e. the desirability of preserving or enhancing the character or appearance of CAs should also be given *“considerable importance and weight”*.

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.”*

6 Stow Park Circle is one of a pair of semi-detached Victorian villas located within the heart of Stow Park Conservation Area.

As identified within the Stow Park Conservation Area Appraisal, February 2020 (CAA):

“3.4.1 Important views within the Stow Park Conservation Area are largely channelled by its streetscapes, especially at intersections where views are split down diverging streets; including the junction of Caerau Road and Caerau Crescent, and the north end of Stow Park Circle. The steep slope of Stow Park Avenue also contributes to views up towards Stow Hill and down towards Belle Vue Park, with the elevated position of the terraced houses on the east side of the road emphasising their presence.

3.4.2 The higher proportion of greenery around Stow Park Circle creates very different types of views in the south-west corner of the Conservation Area, shielding many of the buildings behind mature boundary planting and trees. This means that the buildings are glimpsed between gaps in the planting and the overall character is much greener and less urban than the north and east sides of the Conservation Area.

3.6.1 The architectural character throughout the Stow Park Conservation Area varies greatly: there is no one uniform style although there are obvious classical and Arts & Crafts influences.

3.6.2 The houses in Stow Park Circle are typically large, villa-style buildings set back from the road and in an elevated position, which further emphasises their large scale. By contrast, the rest of the Conservation Area typically consists of townhouses, both terraced and semi-detached. Those on Stow Park Avenue are notably large in their scale and dominant within the streetscape as a result of their size and the topography at the south end of the Conservation Area. Those on the north side of the Conservation Area are typically smaller in comparison.

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.*

3.6.7 Stow Park Circle & Stow Park Crescent: characterised by large villa-style houses, typically set back within their plots with mature planted boundaries (occasionally accompanying low walls). Front-facing gable ends are common and half-timbering is often incorporated on upper levels.

3.7.1 The open spaces within the Conservation Area are typically private gardens with lush mature planting around their edges, especially in Stow Park Crescent and Stow Park Circle. This provides important visual amenity to the streetscapes and contributes substantially to their leafy, green character. The tree cover also creates a distinctive contrast of light and shade throughout the Conservation Area, often emphasising the upper storeys of buildings as they catch the sunlight.

4.1.1 The Stow Park Conservation Area is highly significant as a demonstration of Newport's commercial successes in the late 19th and early 20th centuries, and the impact this had on the City's growth. The quality and variety of its architecture, combined with its distinctive greenness results in a highly significant and unusual suburb. Unlike much of the wider suburban development in Newport, Stow Park has a distinctive configuration, especially the looped arrangements in the south-west portion of the Conservation Area.

4.1.2 The different types of architecture throughout the Conservation Area is illustrative of its phased development and result in an aesthetic variety, especially the contrast of the highly visible terraces and more hidden villas. Characteristic features such as prominent gables, ornate detailing and prominent positioning add further to the aesthetic value of the buildings.

4.1.4 Overall, the special interest of the Stow Park Conservation Area is drawn from its historical links with Newport's 19th-century commercial prosperity and the architectural richness this afforded in the growing suburbs. The ratio of greenery to buildings is also a highly significant characteristic of the Conservation Area and sets it apart from other suburbs.

Relevant Aims and Objectives within the Stow Park CAA are:

2. Buildings, features and spaces identified as making a positive contribution to the Conservation Area will be afforded protection against harmful change.

Reason: To protect the character of the Conservation Area as a whole and the significance of its individual heritage assets, in line with Government policy.

5. The rich green-ness of the Conservation Area should be protected through the considered management of existing trees and careful design of new planting.

Reason: To protect a defining characteristic of the Conservation Area and to manage trees in line with other local policy.

6. Newport City Council will resist development where the high proportion of green space to building is affected.

Reason: To protect a defining characteristic of the Conservation Area.

7. Development within the setting of the Conservation Area which harms its character should be resisted. Development which positively contributes to the setting of the Conservation Area will be encouraged.

Reason: To protect and enhance the Conservation Area in line with Government policy.

6 Stow Park Circle is identified as a Positive Contributor towards the character and appearance of Stow Park Conservation Area within the relevant Conservation Area Appraisal.

Note also that there is an Article 4(2) Direction in place within the area, which restricts numerous 'permitted development rights' afforded to dwellinghouses under the GPDO 1995 (as amended). These are:

- *Removal, renewal or alteration of doors, door frames, windows and window frames, set within external walls of dwelling houses*
- *Alteration or addition of door and window opening, including heads, quoins and cills set in external walls of dwelling houses*
- *Removal, renewal or alteration to the external covering (including slates, tiles and ridge cappings) of the roof covering of a dwelling house*
- *Replacement, removal or renewal of rainwater goods, fascias and soffits*

- *Painting of external walls in a manner that materially affects the external appearance of a dwelling house*
- *Erection, renewal, alteration or demolition of the whole or any part of any gate, fence, wall or other means of enclosure*
- *The construction of a porch outside any external door which faces a highway*
- *The construction of a hard surface where it is nearer a highway than the dwelling*
- *The removal of render, spar, pebbledash or any similar surface finish to the walls of a dwelling house*
- *Insofar as any such development referred to above would front onto a highway or open space.*

2. Observations

Development within the Curtilage

The property in question is identified as a Positive Contributor towards both the character and appearance of Stow Park Conservation Area, being one of a large pair of ornate semi-detached Edwardian houses typical to the area, set back from the road within a generous plot, with lawned front garden and mature planted boundary line to Stow Park Circle.

It is notable that no existing site plan is provided to show the current extent of both hardstanding and green garden area to the prominent roadside front of the property. This should be provided as part of the application, to clearly demonstrate the extent of proposed alteration within the curtilage.

Though the retained/replanted front hedging will inevitably provide some future screening of the property and its proposed alteration (see below), it must be borne in mind that any future removal of hedging would not constitute development requiring planning permission - and therefore cannot be considered to provide adequate mitigation for any harm proposed.

Notwithstanding the absence of detailed existing site plans, it seems clear that the existing, generous and green front is proposed to be entirely eliminated (barring retention/reintroduction of hedging to the front boundary), with extension of raised

paving to the front of the house, extension of what is presumably tarmac across the entire front garden, the introduction of car parking behind the front boundary hedging, and the introduction of both bin and bike storage directly before the house. Such loss of planting will negatively impact upon the rich green-ness of the area (as identified within the CAA), and the proposed enclosures to the front garden will directly distract from and intrude into principal views of the building. This will result in harm.

Alterations to the Building

The existing property frontage appears to have lost its original timber sliding sash windows prior to enactment of the abovementioned Article 4(2) Direction (2020). The property has also, at some stage seen reorientation of principal entrance to the property from side lobby entry (as per no.8) to front, via elimination of its tripartite stone transom and mullion window and the introduction of a door with side lights within the aperture. This has resulted in harmful unbalancing of the semi-detached pair.

As part of this application, it is proposed to further amend existing windows adjacent to the ground floor front entrance, to enable subdivision of the existing sitting room at ground floor. In my view, this will result in further, harmful unbalancing of the principal front of this semi-detached pair and, by extension, further harm to both character and appearance of Stow Park Conservation Area.

Any opportunity for enhancement elsewhere, which may contribute towards mitigation of harm, has been ignored.

Conclusion

These proposals would result in harm to both character and appearance of the Stow Park Conservation Area, contrary to the aims of S160(1) of the Historic Environment (Wales) Act 2023, Planning Policy Wales (Edition 12, 2024), Policy CE7 of Newport Local Development Plan 2011 – 2026, January 2015 and the Stow Park Conservation Area Appraisal, February 2020.

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

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