

Brinkworth, Emma (Planning Officer)

From: Arnall, Guy
Sent: 20 October 2025 15:36
To: Brinkworth, Emma (Planning Officer)
Subject: RE: Planning Consultation Request for case ref: 25/0813 & 25/0814 (33 High Street Newport South Wales NP20 1GH) (FULL)

Hi Emma

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 Historic Environment Wales Act 2023 (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” (emphasis added).

The HEWA 2023 also inserts a new section 314A into the Town and Country Planning Act 1990 in Wales (Wales: duties relating to listed buildings and features of architectural or historic interest) (TCPA 1990), which imposes the duty (derived from section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990) that “*In considering whether to grant planning permission for development which affects a listed building or its setting, the Welsh Ministers or a local planning authority in Wales must have **special regard** to the desirability of preserving: (a) the listed building, (b) the setting of the building, or (c) any features of special architectural or historic interest the building possesses*” (emphasis added).

I would also draw your attention to Sullivan L.J.’s judgment in the case of [Barnwell Manor](#) where it is identified that Parliament, in enacting section 66(1), did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “**considerable importance and weight**” when the decision-maker carries out the balancing exercise (emphasis added) (see paragraph 29), and that said section 66(1) duty should apply “...with **particular force** if harm would be caused to the setting of a Grade I listed building, a designated heritage asset of the highest significance” (emphasis added) (see paragraph 28).

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 of relevance to the assessment of this application, in particular the following statement:

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)

Newport LDP 2011-26 states that:

CE7 Conservation Areas

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.*

SP9 Conservation of the Natural, Historic and Built Environment

THE CONSERVATION, ENHANCEMENT AND MANAGEMENT OF RECOGNISED SITES WITHIN THE NATURAL, HISTORIC AND BUILT ENVIRONMENT WILL BE SOUGHT IN ALL PROPOSALS.

2.34 Newport has a wide range of historically important buildings and sites. There are over 400 Listed Buildings, 15 Conservation Areas, 11 Historic Parks and Gardens, 67 Scheduled Ancient Monuments, 4 Archaeologically Sensitive Areas and over 50 square kilometres of landscape registered as being of Outstanding Historic Interest. These nationally and internationally recognised sites are complemented by a variety of locally important historic buildings and sites which this Plan seeks to protect. The protection, retention, safeguarding, conservation and enhancement of heritage assets will be sought, and where new development is proposed that affects the building or site or its setting, this should be of the highest quality.

Regarding the historic environment, it goes on to state that:

4.18 There will be a presumption in favour of the retention, safeguarding, conservation and enhancement of sites recognised as being of archaeological or historic interest including Listed Buildings, scheduled ancient monuments, Conservation Areas, locally Listed Buildings, historic parks & gardens, historic landscapes and the setting of such sites, buildings and areas.

2. Analysis

We have previously refused a similar application for this location under apps 25/0418 & 25/0419.

The proposed is a 2.6m in height and 1.3m wide 'Communication Hub' unit, featuring on one side an 86" screen and on the other a 32" touchscreen. It is proposed to be located outside 33 High Street, within the Town Centre Conservation Area (CA).

According to the Town Centre Conservation Area Appraisal (CAA) (April 2018), *‘High Street is one of the principal thoroughfares through the Town Centre Conservation Area’*, originating from the earliest medieval layout of the settlement. Here, a key architectural characteristic of the Conservation Area is the distinctive groups of buildings behind a unified elevation. Those on the High Street are especially notable for the sheer size of the elevations, further enhanced by the tightly compacted streetscape. The CAA identifies ‘Important Views’, both north and south along High Street.

In addition, it states that:

‘Corner buildings are among the most prominent in the Conservation Area, especially on Commercial Street where there are a number of junctions with secondary thoroughfares. Clock towers, turrets and protruding bays are common features on these buildings, making them prominent markers within the streetscape and the visual flow from one street to another smoother.’

This is particularly true of those buildings which overlook the expansive junction of High Street, Commercial Street, Bridge Street, Skinner Street and Stow Hill, located directly to the south of the proposed. The ornate buildings which surround this junction, a number of which are GII Listed (see below), make for perhaps the most spectacular vista within the Conservation Area as one approaches both south via the High Street, and north via Commercial Street. Accordingly, views south from the southern end of High Street, and views north from the northern end of Commercial Street (both of which overlook this expansive junction) are identified as ‘Important Vistas’ within the CAA.

The broad area of pavement upon which the ‘hub’ is proposed is relatively uncluttered by street furniture and the advertising, branding, and fascia signs present on nearby buildings in retail and commercial use at ground-floor level is predominantly refined and notably visually restrained in appearance. The site contributes to the significance of the conservation area primarily by its function as part of the wider pavement area which provides a relatively uncluttered space which affords clear southerly views of the architecturally impressive buildings which surround the junction. It also allows for uninterrupted appreciation of that identified ‘important view’ north along the more tightly compacted High Street.

The proposed ‘Communication Hub’ would be a tall and wide structure in its context, with a rectangular block-like design. Due to its height and design (with illuminated screens), in its prominent location on this broad area of pavement, the proposed ‘Hub’ would be viewed as an imposing and visually incongruous item of street furniture which would unduly detract from the fine examples of high-quality architecture and the visually restrained and aesthetically-pleasing facades and mostly restrained fascia signage present on the commercial and retail frontages near the site. Moreover, due to its large scale in comparison with most other items of nearby street furniture (bollards) it would serve to add visual clutter to the street scene.

The proposed will intrude directly into those important views north from the southern end of Commercial Street and the channelled northerly view along High Street, presenting an illuminated 86” screen which would distract from said views - and from views of the historic assets which overlook the wide junction (including Grade II Listed National Westminster Bank (including Nos.2 & 4 Cambrian Road), 31, 32, 33 High Street, including 2a & 2-4 Skinner Street) and those which line High Street (34 & 35 High Street, 27-30 High Street (Consecutive and including 27a).

Within views from the southern end of High Street, the proposed will intrude directly into the ‘Important Vista’, with a 32” digital screen. This southern view from the end of High Street also provides key view longer-range view of the Grade II Listed Westgate Hotel from the north, where it is framed by the tall buildings which flank the narrow street – a setting which contributes strongly towards its significance. Indeed, the asset is *“Listed as elaborate large scale Victorian hotel on a prominent site whose architecture makes an important contribution to Newport's most important commercial street, and the conservation area.”* The proposed will intrude directly into this key view of the asset. Similarly, the prominent setting of the GII Listed HSBC (formerly Midland Bank), to the opposite side of the junction, will also be impacted.

3. Conclusion

It is concluded that there will be considerable harm to both the character and appearance of the Town Centre Conservation area, and the setting of nearby Listed assets by virtue of the visual interruption, distraction and additional street clutter and bright illuminated signage will bring. This is contrary to HEWA 2023, TCPA 1990, PPW12 and the aims of the Newport Local Development Plan 2011 – 2026.

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

E: Guy.Arnall@newport.gov.uk | Planning@newport.gov.uk

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

From: planning@newport.gov.uk <planning@newport.gov.uk>
Sent: 08 October 2025 13:02
To: Arnall, Guy <Guy.Arnall@newport.gov.uk>
Subject: Planning Consultation Request for case ref: 25/0813

Dear Principal Heritage Officer

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

App Number: 25/0813
Address: 33 High Street Newport South Wales NP20 1GH
Proposal: INSTALLATION OF AN INTERACTIVE COMMUNICATION HUB UNIT WITH INTEGRAL ADVERTISEMENT DISPLAY, DEFIBRILLATOR AND CITY WAYFINDING

submitted on 30 September 2025.

View details of 25/0813 at Newport Council - Planning Online:

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpublicaccess.newport.gov.uk%2Fonline-applications%2Fplan%2F25%2F0813&data=05%7C02%7CGuy.Arnall%40newport.gov.uk%7C40960de178b64e9d6a1708de06626d8b%7C2c4d0079c52c4bb3b3cad8eaf1b6b7d5%7C0%7C0%7C638955217823266438%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslAiOiJXaW4zMlslkFOljoITWFpbCIsldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=3bWDRFpVRx8nIdMC2HIM44mfWq44Q8UaPFg1scJrns%3D&reserved=0>

Your sincerely
Development Management