

## Brinkworth, Emma (Planning Officer)

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**From:** Arnall, Guy  
**Sent:** 05 August 2025 11:16  
**To:** Brinkworth, Emma (Planning Officer)  
**Subject:** RE: Planning Consultation Request for case refs: 25/0418 & 25/0419 (Land Adjacent To 33 High Street Newport South Wales) (FULL & ADV)

Hi Emma

### 1. Legislation, Policy and Guidance

The Historic Environment (Wales) Act 2023 (HEWA 2023) came into force 4<sup>th</sup> 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).

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)*

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.*

With regard to the Historic Environment, the LDP also states 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**

According to the Town Centre Conservation Area (CA) Appraisal (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 the street. In addition:

*‘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. These ornate buildings, a number of which are GII Listed, make for a spectacular vista as one approaches south via the High Street (identified as an Important Vista within the CAA), where they make a very positive contribution to the character and appearance of the CA.

The proposed will intrude directly into the important views along High Street, and directly into the ‘Important Vista’ identified above, with a digital screen reaching some 2 metres from ground level and providing very harmful visual distraction and street clutter within this key conservation area view.

The 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 and contributes 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.

### 3. Summary

It is concluded that there will considerable harm to both the character and appearance of the Town Centre Conservation area, and the setting of nearby Listed assets – in particular Grade II Listed Westgate Hotel - 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)

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