

From: Arnall, Guy <Guy.Arnall@newport.gov.uk>
Sent: 13 November 2025 13:12:58 UTC+00:00
To: "Cooke, Jacob (Senior Planning Officer)" <Jacob.Cooke@newport.gov.uk>
Subject: RE: Planning Consultation Request for case ref: 25/0942 (13 Clytha Square Newport NP20 2EF) (FULL)

Hi Jacob

Re: CHANGE OF USE FROM OFFICE SPACE TO 5 NO. APARTMENTS

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 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"*.

Planning Policy Wales (Edition 12, 2024) states that:

6.1.6 The Welsh Government's specific objectives for the historic environment seek to:

"Preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous;

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.

6.1.16 Preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area's character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area."

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."*

2. Comments

13 Clytha Square is an unlisted asset located within Clytha Conservation Area. There is no Article 4 Direction within the area.

Though the area is principally characterised by a strong Italianate architectural influence, according to the CAA:

"The rest of the buildings within the Conservation Area – those facing onto Cardiff Road and at the far west end of Clytha Terrace – are more individual in their architectural style, although there is still a strong classical influence among most, especially in their fenestration and detailing. Nos. 13 and 14 Clytha Square are unusual within the Conservation Area for their Gothic style, with gables and pointed arches."

13 & 14 Clytha Square are a semi-detached pair identified as "*Positive Contributor/Locally Important Building*", being a prominent pair of properties which terminate the long, westerly "*Important view*" along the southern side of the square. Being set back from the pavement behind generous front gardens and (now amended) boundary walls further enhance their status; having been constructed as prime residences at the up-hill head of the open square.

As a non-dwellinghouse, the property does not benefit from any householder 'permitted development' rights.

Windows and Doors

- Existing windows have seen detrimental past alteration. Whilst it is unclear whether these works were undertaken prior to designation of the CA on 25 June 1999, they were certainly in situ by 2008 and are therefore not enforceable.
- There are no proposals to alter the existing windows to the front elevation as part of this application: a seriously missed opportunity for enhancement of the building, the pair (where no.14 next door retains original configuration), and the wider conservation area. I would note

here that any alteration to windows and external doors across the building will require planning application.

- Is it proposed to retain what looks like a roller-shutter to the side elevation entrance?
- Replacement of the side (fire escape) door with a new window would be considered to bring benefit to the building and CA, due to the incongruous nature of a doorway at this level, and removal of the external staircase (see below). Details may be secured by condition.

Fire Escape Stairs

- Removal of the existing fire escape stairs will bring benefit towards character and appearance, the existing being very unsightly and visible at height upon the side of the building.

Roof

- Both existing and proposed elevation drawings are missing the shared central chimney stack. This should be amended for the avoidance of doubt (noting that its loss would be harmful to character and appearance and would not be supported).
- Should any works to roof coverings be undertaken following inspection, these will need to be undertaken upon a strictly 'like-for-like' basis, including retention of the decorative roll-top ridge tiles to the longitudinal roof and the wrought iron finial to the front dormer gable. Note that any alterations will require planning consent. _
- Rooflights to the rear slope will be unseen from within the public realm of the CA and will not impact upon its setting (due to lack of prominence). _

Front Boundary and Garden

- The front boundary wall exceeds 1 metre in height against the highway and therefore requires planning permission for alteration. Though likely once formed in buff brick (with recessed panels to match the wall to no.14 adjacent), the existing wall red brick wall with half-round capping is of some interest.
- Whilst widening of the opening would not be considered harmful per se, the proposed introduction of hardstanding and car-parking to the front of the building would be considered harmful, due to loss of the green front garden and obscuration of the building by parked cars. This is contrary to Policy CE7 (Item V).

Cleaning

- The building will benefit from removal of ivy and vegetation growth. Whilst outside of our control, I would strongly recommend against the use of pressure-washing. The building is solid masonry construction, and any such approach runs the risk of deep water penetration, saturation and acceleration of decay. The applicant should investigate non-abrasive, low saturation methods such as DOFF.

Many thanks,

Guy Arnall

Prif Swyddog Treftadaeth / Principal Heritage Officer

Your sincerely
Development Management