

From: Arnall, Guy
Sent: 20 April 2026 09:01
To: Ostler, Marnie (Planning Officer) <Marnie.Ostler@Newport.gov.uk>
Cc: Gunther, Neil (Senior Enforcement Officer - Strategic)
Subject: RE: Planning Consultation Request for case ref: 26/0279 (46 Dolphin Street Newport NP20 2AT) (FULL)

Hi Marnie

Re: PROPOSED REPLACEMENT OF FRONT DOOR (RETROSPECTIVE)

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.”

According to the adopted Lower Dock Street Conservation Area Appraisal:

“This [Dolphin] Street is unique within the neighbourhood by virtue of the twin residential street frontages of a single phase of Edwardian development. The two storey, in-line, terraced housing is approximately contemporary with the opening of the Alexandra Dock extension in 1893, which provided the impetus for additional housing in Pillgwenlly. The terraces are simply detailed with red brick elevations. The simply chamfered heavy Bathstone window and door lintels are carried along the terrace by the use of buff string courses at eaves and intermediate floor levels. The use of paired sashes at ground floor level differentiates this later phase of residential development from the earlier Victorian development in adjacent streets. The Street is also noteworthy by virtue of its length and straightness, which must originally have been further enhanced by the strong architectural rhythm of the terraces with their continuous buff string courses. The extensive postwar alterations carried out within the street have served to destroy the street scape as a homogeneous composition. The pebble dashing of individual properties has been particularly damaging. A limited area of redevelopment has taken place between numbers 73-76 and whilst the scale of the new development is broadly similar to the original terraces, subtle differences in the proportions of the elevations fail to respond to the existing, strong repetitive form. Furthermore, the development fails to define the street corner in a coherent and legible manner, resulting in a weak element within the streetscape.”

2. Observations

46 Dolphin Street is located within the “Tredegar Market Quarter” of Lower Dock Street Conservation Area, wherein an Article 4(2) Direction restricts the “Removal, renewal or alteration of doors, door frames, windows and window frames, set within external walls of dwellinghouses... insofar as any such development referred to above would front onto a highway or open space.”

The property in question retains its unrendered front elevation, with buff brick string courses which align with bath stone lintels to window and door openings, though its original timber sash windows have, at some stage, been lost. The ‘existing’ front door was in painted timber with a raised-and-fielded four-panel arrangement, set within a timber frame with plain fanlight over. Though such details were not entirely

correct for the original joinery to the street (thought to be the bolecion-moulded four-panel timber doors with central brass knob to locking rails - as per those see those adjacent to nos. 45 and 44), it retained a materiality, form and a setting-out similar to these traditional doors, with a traditional painted timber finish and an overall appearance which made a positive contribution towards the character and appearance of the area.

As replaced, the new is a faux Victorian uPVC door with bolecion moulded panelling, with uPVC door frame, identifiable by its smooth, uniform surface finish, bulky sections, and applied decorative elements. These characteristics deviate from the recognised original door form for the street, are inherently modern, and lack the traditional setting-out and authentic detailing of timber joinery; featuring a sheen and mass-produced appearance, the materiality of which also contrasts strongly with the softer, painted finishes of traditional doors and joinery which make a positive contribution towards the area.

Though it is recognised that there has been incremental and detrimental change to the character and appearance of the area over time, this work (which has already undertaken) results in further, harmful change, and therefore fails to preserve or enhance the character or appearance of Lower Dock Street Conservation Area, contrary to the aims of Section 160 of the Historic Environment Wales Act 2023, the objective of Planning Policy Wales (Edition 12, 2024) and Policy CE7 of Newport Local Development Plan 2011 – 2026 (January 2015).

As a result, this is now a matter for enforcement.

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