

From: Arnall, Guy

Sent: Thursday, May 14, 2026 10:03

To: Burrows, Lydia (Planning Officer) <Lydia.Burrows@newport.gov.uk>

Subject: RE: Planning Consultation Request for case ref: 26/0332 (33 High Street Caerleon Newport NP18 1AE) (LBC)

Hi Lydia

Re: REPLACEMENT OF BOILER, FLUE AND RADIATORS

Legislative and Policy Framework:

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1. HISTORIC ENVIRONMENT (WALES) ACT 2023

Section 96(2) of the Historic Environment (Wales) Act 2023 sets out that in considering whether to grant listed building consent, a planning authority must have special regard to the desirability of preserving— (a) the listed building to which the application relates, (b) the setting of the building, and (c) any features of special architectural or historic interest the building possesses.

The Development Plan comprises FUTURE WALES – THE NATIONAL PLAN 2040 and the NEWPORT LOCAL DEVELOPMENT PLAN (2011-2026), although by virtue of Section 70(2) of the Town and Country Planning Act 1990, there is no statutory requirement to have regard to the Development Plan in determining applications for Listed Building Consent.

2. The National Development Framework: Future Wales - the National Plan 2040

Future Wales sets out the Welsh Government's land use priorities and provides a national land use framework for SDPs and LDPs. Future Wales concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas that need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.

Policy 1 - Where Wales Will Grow

Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking

Policy 9 - Resilient Ecological Networks and Green Infrastructure

3. Planning Policy Wales (Edition 12) 2024

Planning Policy Wales (Edition 12) was revised and restructured in February 2024. Its primary objective 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, particularly:

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

- *Protect the Outstanding Universal Value of World Heritage Sites;*
- *Conserve archaeological remain, both for their own sake and for their role in education, leisure and the economy;*
- *safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;*
- *preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous;*

- *preserve the special interest of sites on the register of historic parks and gardens;*
- *protect areas on the register of historic landscapes in Wales. (para 6.1.6)*

There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the building, its setting or any features of special architectural or historic interest which it possesses (para. 6.1.10)

For listed buildings, the aim should be to find the best way to protect and enhance their special qualities, retaining them in sustainable use. The continuation or reinstatement of the original use should generally be the first option, but not all original uses will now be viable or appropriate. The application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building's survival or provide it with a sound economic future (para 6.1.11)

The demolition of any listed building should be considered as exceptional and require the strongest justification (para 6.1.12)

4. PPW12 is supported by a series of more detailed Technical Advice Notes (TANs), including TAN 24: The Historic Environment (May 2017).

Paragraph 5.13 of TAN 24 advises that when determining a listed building consent application, the local planning authority should consider the following issues:

- *The importance and grade of the building and its intrinsic architectural or historic interest.*
- *The physical features of the building which justify its listing and contribute to its significance, (for example its form and layout, materials, construction and detail) including any features of importance such as the interior, which may have come to light after the building's inclusion on the list.*
- *The contribution of curtilage and setting to the significance of the building, as well as its contribution to its local scene.*

- *The impact of the proposed works on the significance of the building.*
- *The extent to which the proposed works would bring substantial community benefits for example, by contributing to the area's economy or the enhancement of its local environment.*

It further advises that:

The listing grade may be a material consideration but is not in itself a reliable guide to the sensitivity of a building to alteration or extension. For example, many grade II buildings are humble, once common building types, listed precisely because they are relatively unaltered examples of their kind and their special interest can be damaged by inappropriate alteration or extension. (para 5.13)

Many listed buildings can sustain a degree of sensitive alteration and extension to accommodate continuing or new uses. Past changes that reflect the history of use and ownership may themselves be aspects of the special interest of the listed building. When applicants and the local planning authority assess the heritage values and significance of a listed building, which is the subject of a consent application, they must consider the sensitivity of that building to the proposed changes. Sustaining the special interest and significance of a listed building through the process of alteration, extension or re-use is exacting and should always be based on specialist knowledge and skill in order to realise the benefits that well-designed interventions can bring. (para 5.14)

5. Other relevant evidence or policy guidance includes:

- CADW, Conservation Principles (2011) and
- CADW, Managing Change to Listed Buildings in Wales (2017)

6. Newport Local Development Plan (2011-2026)

The Newport Local Development Plan 2011-2026 (adopted in January 2015) sets out the relevant planning policies at the local level, insofar as heritage matters are concerned. The adopted plan sets out objective 5, that is:

“To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment”.

Thereafter, Strategic Policy *SP9: Conservation of the Natural, Historic and Built Environment* sets out the local authority’s approach, whereby:

“The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals.”

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Observations:

33 High Street Caerleon is a Grade II Listed asset prominent located upon the western edge of the Market Place, within the heart of Caerleon Conservation Area. This road intersection (High Street and Cross Street) is historically known as “The Square”. The building occupies a highly sensitive and historically layered location within the core of both present day Caerleon and historic footprint of the Roman legionary fortress of Isca. This positioning places it at the heart of Caerleon’s Roman origins, its medieval market town development, and its later Georgian prosperity, all making for a site of long-standing historic, communal, and evidential value.

According to the Cadw list entry :

History

This house dates from very close to 1800 and externally has been unaltered since apart from reroofing. It was the birthplace of Arthur Machen (Arthur Jones) (1865-1947) an author who did much to popularise the Arthurian legends and their connection with the Caerleon area.

Exterior

The house is smooth rendered, presumably over local rubble stone and has a Welsh slate roof, red ridge tiles and red brick stacks. It has a two storey, central entrance plan, with a small rear wing. Six-panel door with fanlight and broken pediment on brackets, reeded pilasters. Three windows, all plain sashes with 6 over 6 panes. Moulded timber eaves cornice. Low pitch roof with gable ends, stacks at each gable and to rear wing, that to the left gable is shared with No 32. Rear elevation not seen.

Interior

Not inspected at time of resurvey. The ground floor windows have panelled shutters.

Reason for Designation

Included as a late C18 or early C19 house retaining significant historic character and having strong group value with the surrounding historic buildings in the centre of Caerleon.

According to the supplied HIS:

As proposed, the existing modern gas boiler will be removed from the building, to be replaced with a new, modern unit. As the existing gas supply pipe cannot to be reused, new pipework is required, to run along the existing route. Existing heating pipes to radiators are also to be reused, meaning that no new penetrations or routes are required. Where new radiators are required, they will match the design and location of the existing. The only externally visible alteration is for a new horizontal flue to replace the existing at the rear of the asset, to meet current guidelines. The flue will be black (as per the existing) and will not require a plume kit. It is proposed to reuse the existing flue location and its route through the masonry envelope of the building.

It is clear from supplied information that the existing boiler installation is modern, and is consequently of no special architectural or historic interest. Upon this basis, it is considered that the 'like-for-like' replacement of modern boiler, associated flue, and radiators, to a matching design, will have no impact upon the special interest of the listed asset.

Conclusion:

Section 96(2) of the Historic Environment (Wales) Act 2023 sets out that in considering whether to grant listed building consent, a planning authority must have special regard to the desirability of preserving— (a) the listed building to which the

application relates, (b) the setting of the building, and (c) any features of special architectural or historic interest the building possesses.

Having regard to the Local Planning Authority's statutory duties, it is considered that special interest of the Grade II listed building will be preserved. Accordingly, it is recommended that Listed Building Consent be granted, subject to conditions.

Conditions:

1. The development shall be implemented in accordance with the following plans and documents:
 - Site Location Plan "*MACHEN INTERIORS, 33, HIGH STREET, NEWPORT, NEWPORT, NP18 1AE*" (received 30/04/2026)
 - Site Plan "*MACHEN INTERIORS, 33, HIGH STREET, NEWPORT, NEWPORT, NP18 1AE*" (received 30/04/2026)
 - Adfer Conservation "*HERITAGE IMPACT ASSESMENT 33 HIGH STREET, CAERLEON*" (received 30/04/2026)
 - Drawing AL.02.01 "*Existing and Proposed Elevations*" (received 30/04/2026)

Reason: In the interests of clarity and to ensure the development complies with the submitted plans and documents on which this decision was based.

2. All new external and internal works and finishes and works of making good shall match the existing original work adjacent in respect of materials used, detailed execution and finished appearance, except where indicated otherwise on the plans hereby approved, or as required by any conditions attached to this consent.

Reason: To safeguard the special interest of the listed building pursuant to Sections 96 and 97 of the Historic Environment (Wales) Act 2023.

Informatives:

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1. During the works, if any hidden historic features of significance are revealed, they should be retained in-situ. Works shall be halted in the relevant area of

the building, and the Local Planning Authority should be notified immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed.

2. Section 96 of the Historic Environment (Wales) Act 2023 was relevant to the determination of this application. The development plan for Newport is the Newport Local Development Plan 2011 – 2026 (Adopted January 2015) Policy SP9 was relevant to the determination of this application.
3. Due to the minor nature of the proposed development (including any demolition) and the location of the proposed development, it is considered that the proposals did not need to be screened under the Environmental Impact Assessment Regulations.

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Notes:

- This application for works to a Grade II listed asset may be determined under my delegated authority, with no need to notify Cadw. For the avoidance of doubt, please add the following to the conclusion of the LBC report: ***This conclusion is consistent with the advice received from a named Building Conservation Officer with the appropriate Cadw LBC delegation: Guy Arnall.***
- Please also note that Tan 24 has now been updated ([March 2026](#)). Please ensure that any references to this document within your LBC report are updated to reflect the change.

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