

Aldous, Catherine (Senior Planning Officer)

From: Arnall, Guy
Sent: 31 March 2026 09:41
To: Aldous, Catherine (Senior Planning Officer)
Subject: RE: Planning Consultation Request for case ref: 26/0206 (St Woolos Court Clifton Place Newport NP20 4EX) (FULL)

Hi Catherine

Re: REPLACEMENT OF WINDOWS

Legislation, Policy, and Guidance

In respect of Conservation Areas, Section 160 of the Historic Environment Wales Act 2023 (HEWA) 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).

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.”

Section 90 of the HEWA inserts a new section (314A) into the Town and Country Planning Act (1990) which, in Wales, imposes the duty 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).

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

“6.1.10 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.”

I would also draw your attention to Sullivan L.J.’s judgment in the case of [Barnwell Manor](#) where it was 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).

Regarding historic assets and their Setting, Newport LDP (2011 -26) 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.

4.19 Listed Buildings play a significant role in the townscape and architectural heritage of the area and the Council attaches the upmost importance to their preservation. The Council, in the determination of applications for Listed Building consent, is expected to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” The Council will consider using all available powers to protect the historic environment, including, in appropriate cases, serving repairs notices, enforced sales and Compulsory Purchase Orders or in the case of vacant buildings, carrying out emergency repairs and seeking reparation from the owner subsequently. Supplementary Planning Guidance on Repairs and Alterations to Listed Buildings will be prepared. The Council will continue to monitor its Register of Buildings at Risk Through Neglect and Decay in order to secure the safeguarding of important buildings.”

Policy SP9 of the Newport LDP (2011-26) states that:

“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.”

'Planning Policy Wales Technical Advice Note 24: The Historic Environment' states that:

‘1.25 The setting of an historic asset includes the surroundings in which it is understood, experienced, and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.

1.26 It is for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, World Heritage Sites, or other sites of national importance and their settings. These principles, however, are equally applicable to all historic assets, irrespective of their designation. For any development within the setting of a historic asset, some of the factors to consider and weigh in the assessment include:

- *The significance of the asset and the contribution the setting makes to that significance*
- *the prominence of the historic asset*
- *the expected lifespan of the proposed development*
- *the extent of tree cover and its likely longevity*
- *non-visual factors affecting the setting of the historic asset such as noise.*

1.27 Other factors which may affect the setting of a historic asset include; inter-visibility with other historic or natural features, tranquillity, noise or other potentially polluting development though it may have little visual impact

1.28 There will be cases where a proposed development will enhance the setting of a historic asset and this will be treated as a benefit resulting from the development. Mitigation of damaging effects could be achieved through good design and in some cases screening or landscaping.

1.29 The local planning authority will need to make its own assessment of the impact within the setting of a historic asset, having considered the responses received from consultees as part of this process. A judgement has to be made by the consenting authority, on a case-by-case basis, over whether a proposed development may be damaging to the setting of the historic asset, or may enhance or have a neutral impact on the setting by the removal of existing inappropriate development or land use.’

Cadw Guidance 'Setting of Historic Assets in Wales (2017)' states that:

Applicants for planning permission should provide the local planning authority with sufficient, but proportionate, information to allow the assessment of the likely impact of proposals for development on a historic asset and its setting in:

- *a World Heritage Site*
- *a nationally important ancient monument or archaeological remains (scheduled or unscheduled)*
- *a listed building*
- *a conservation area*
- *a registered historic park and garden.*

Context

The building in question is a large, three-storey block of flats approved in the late-C20 under application 93/0676. It was built upon the site of the former St Woolos Church Hall. The existing building is essentially of classical design, featuring a pitched and artificial slated roof, ordered windows and white render finish. Existing windows have top-hung and face-closing timber casement to upper sashes with fixed lower panes, all constructed as false sliding-sash. Of these windows, most prominent are those first-floor faceted oriel type to the western elevation; with flat and corniced roofs, and panelled aprons below.

Though set behind remains of a snecked and rock-faced boundary walls with wrought iron railings (last vestiges of the former church hall boundary) and softened by tree planting, the building is prominently located within St Woolos Conservation Area (upon the corner of Clifton Road and Clifton Place):

- Located close to its eastern curtilage boundary, it directly overlooks Clifton Park - identified as an Important Green Space within the St Woolos CAA.
- Most prominent to the west is a three-storey gable end with oriel window to first floor, directly overlooking Clifton Place and its terrace of houses beyond (of which nos. 2-8 Clifton Place are Grade II Listed).
- Most prominent to the south, another three-story elevation is located close to the boundary, fronting Clifton Road and overlooking Grade I Listed St Woolos Cathedral upon its elevated site, wherein the treed curtilage is surrounded by a boundary wall and railings (structures which fall under the Grade I protection).

As identified above, the building sits in close geographical context with a number of listed assets.

- Alongside the GII listed terraced houses of Clifton Place it frames longer views south towards the GI Listed cathedral along Clifton Place (which is much more visible in winter)
- It forms immediate foreground to the CAA identified "*Major Long Range*" view from the cathedral mound towards the north, identified within the St Woolos CAA.

Considering the high sensitivity of this location there is high potential for impact upon the setting of listed assets and the character and appearance of St Woolos Conservation Area.

Impact

Though existing windows are false sliding sash, they are formed in painted timber. Any replacement in uPVC will need to demonstrate that the works preserve or enhance character or appearance of St Woolos Conservation Area. Whilst this could potentially be achieved via high-quality uPVC, sliding sashes should be the first consideration here; enhancement resulting from a traditional operating mechanism could potentially be balanced against the harm resulting from loss of painted timber fabric.

It is unclear what - if any - works are proposed to the remaining fabric of the prominent first floor oriel windows. In particular, the panelled aprons beneath cill level are degrading and in need of attention. We would be unlikely to support replacement in uPVC.

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

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

From: planning@newport.gov.uk <planning@newport.gov.uk>

Sent: 19 March 2026 13:19

To: Arnall, Guy <Guy.Arnall@newport.gov.uk>

Subject: Planning Consultation Request for case ref: 26/0206

Dear Principal Heritage Officer

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

App Number: 26/0206

Address: St Woolos Court Clifton Place Newport NP20 4EX

Proposal: REPLACEMENT OF WINDOWS

submitted on 17 March 2026.

View details of 26/0206 at Newport Council - Planning Online:

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpublicaccess.newport.gov.uk%2Fonline-applications%2Fplan%2F26%2F0206&data=05%7C02%7CGuy.Arnall%40newport.gov.uk%7Cc7d28096091547c6f6a008de85ba042c%7C2c4d0079c52c4bb3b3cad8eaf1b6b7d5%7C0%7C0%7C639095231228735491%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIsIlAiOiJXaW4zMilslkFOljoitWFrpbClzIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=twdTodNN3icYRtWnxelC%2BPKSAL4nKmhPhSKjklBSz2U%3D&reserved=0>

Your sincerely

Development Management