

Delegated Decision Report

Application No:	25/1069	Statutory Period Expires:	20th March 2026
Site:	<i>Land And Buildings Encompassing 30 To 34 Clarence Place Newport South Wales</i>		
Proposal:	<i>LISTED BUILDING CONSENT FOR THE REPLACEMENT OF EXISTING WINDOWS TO THE REAR ELEVATION OF THE BUILDING WITH NEW WINDOWS</i>		
Applicant:	<i>Mirani</i>		
Type:	Listed Building	Ward:	Victoria
Decision:	GRANTED WITH CONDITIONS		

1. BACKGROUND

- 1.1 This application has been submitted to the Council as a standalone application for Listed Building Consent. Due to the nature of the proposal, it is considered that no associated application for Full Planning Permission is required.
- 1.2 Approved application 25/0199 proposed positive repurposing of this property, works for which were limited to the interior of the building only. This application now proposes limited external works to the rear of the property, namely the replacement of windows. This application is part-retrospective, as a number of timber sash windows to lower levels at the rear have already been replaced.

2. SITE LOCATION AND CONTEXT

- 2.1 30-34 Clarence Place forms part of the Grade II Listed group for Clarence Place, in the Victoria Ward.
- 2.2 The site comprises of 3no. mid terrace units with the principal elevations fronting Clarence Place, formed in red brick with bath stone pilasters and window surrounds. Each individual property has three windows to each floor, the first floor being more ornate. The ground floor features a modern shopfront. To the rear three-storey lateral out-shuts adjoin a further longitudinal terrace, to create a series of deep lightwells within the building which are open to the sky.

The Cadw List Description reads as follows:

“Exterior:

*Belongs to a group of 8:
Nos.20-34 Clarence Place (evens)*

Group of shops, offices and accommodation. An 8-bay 4-storey range of brick and ashlar. Nos.20,22,24 have domestic-style entrances, the rest shopfronts. Apart from the latter, the design is symmetrical and homogenous, all units the same. All windows were plate glass sashes (some replaced) in moulded surrounds. Each unit has a 3-window range, most elaborate to first floor where each window has a heavy Gibbs surround and keystone; central window has an elaborate entablature with deep keystone and broken pediment. 2nd floor has moulded aprons to the two outer windows. The egg and dart cornice continues from the adjacent range 10-18 Clarence Place, the dividing pilasters too are similar but the Ionic capitals are slightly plainer. On the top storey the pilasters have decorative carved panels; plain cornice and high parapet masking roof. At ground floor level the 3 right units below a deep band have round-arched doorways with Gibbs surrounds and 2 windows with prominent keystones. The shopfronts have all been remodelled although at end left traces of the original remain in 6-panelled doors and 6 pane overlights.

Reason for designation: Included as an integral part of this early C20 commercial development attached to and for group value with Nos 10-18 Clarence Place and the Technical Institute; group value also with the War Memorial.”

3. DESCRIPTION OF DEVELOPMENT

- 3.1 Listed building consent is sought for removal and replacement of decayed modern windows to the rear elevation of the property.

4. RELEVANT SITE HISTORY

Application Number	Proposal	Decision	Decision Date
04/1740	INTERNAL REMODELLING AND REFURBISHMENT	Granted with Conditions	11.03.2005
04/1741	LBC FOR INTERNAL REMODELLING AND REFURBISHMENT	Granted with Conditions	16.05.2005
25/0199	LISTED BUILDING CONSENT FOR INTERNAL RENOVATIONS AND REMODELLING	Granted with Conditions Subject (to Cadw)	22.05.2025

5. LEGISLATIVE AND POLICY FRAMEWORK

5.1 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.

- 5.2 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.

5.3 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

5.4 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)

- 5.5 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)

5.6 Other relevant evidence or policy guidance includes:

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

5.7 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."

6. CONSULTATION RESPONSES

6.1 PRINCIPAL HERITAGE OFFICER:

6.1.1 This application has been fully considered by the Principal Heritage Officer, as author of this report.

6.2 AMENITY SOCIETIES:

6.2.1 Historic Buildings and Places:

Thank you for notifying HB&P of the above application. It is unclear why/what justification there is for the replacement windows to include PVCu frames, rather than timber, which would reflect the age and appearance of the building and its historic character.

The lifespan of any intervention should be considered, particularly where components have a limited life. The service life of PVCu windows is relatively short (less than 25 years) compared to well-maintained timber windows (many of which survive for over 100 years), and a PVCu replacement window will have a higher carbon cost than a traditional window that has been upgraded to improve its energy efficiency.

If Council is minded to support PVCu windows, the design should reflect that of the existing sash windows, not top hung casements, as proposed.

6.3 ROYAL COMMISSION FOR ANCIENT MONUMENTS WALES:

6.3.1 No response.

6.4 HENEB (FORMERLY GGAT)

6.4.1 No response.

7. PUBLIC REPRESENTATIONS

7.1 A site notice was displayed, and a Press Notice was published. No responses were received.

8. ASSESSMENT

8.1 Section 96(2) of the Historic Environment (Wales) Act 2023 requires the Local Planning Authority in considering applications for Listed Building Consent 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 significance of this historic asset is almost exclusively reserved for the grand elevations which front Clarence Place (as described within the list entry), with very little of interest surviving internally due to successive modifications and C20 fitting out. Rear elevations of the principal terrace to Clarence Place exhibit a markedly modern character and appearance, featuring plain railings to flat roof edges, a sharp and white-rendered finish, and mismatched windows. In addition, this elevation is almost entirely concealed from ground-level views by the longitudinal rear range, which embodies some architectural and historic interest, principally derived from its still-surviving (i.e. unrendered) random rubble elevations with brick-dressed window openings, and timber sliding sash windows. However, it should be noted that thorough site inspection has made clear that timber sliding sash windows to all rear elevations are formed in poorly detailed modern joinery: featuring a non-traditional 'horn' shape, external square-bead in lieu of putty chamfer to glazing, and double-glazed units with silver-finished perimeter spacer bars (see sample photos within the application file).

As a part-retrospective application, these modern timber sliding-sash windows to the most prominent (and significant) rear longitudinal range have already been replaced with new timber sliding-sash windows. This new timber joinery features detailing of considerably more appropriate form: traditional 'horn' moulding, a putty chamfer to exterior of the glass perimeter, and slimline double-glazed units with white perimeter seals (see sample photos within the application file). The result is enhancement to these most significant areas of the rear elevation.

Windows to the upper-level rear of the principal terrace are also proposed to be replaced as part of this application, with uPVC casement windows. Whilst these are not generally considered appropriate for a listed building (resulting in some harm to character and appearance), the evident difficulties of access for future maintenance have been taken into account, and it is considered that this harm is partially mitigated by: the modern nature of the windows proposed for removal (see description already outlined above), their poor condition (due to difficulties of access), the setting out of the new (50:50 split to match the existing), the absence of visible trickle-vents within the new, and their very low visibility from public viewpoints (due to the confined nature of the rear yard, their set-back position, and the significant concealment offered by the longitudinal terrace which fronts the rear yard).

Though limited harm has been identified as part of this application it may, in this instance, be balanced against those enhancements already undertaken to those windows of the most prominent (and significant) rear elevations, and the substantial community benefits resulting from ongoing works to the building, which will ensure that this currently vacant grade II listed asset remains viable and useful into the future.

Considering the modern nature of the building interiors, conditions relating to methodology for the proposed window replacement works are not considered necessary.

9. CONCLUSION

- 9.1 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, on balance, the special interest of the building will be preserved. Accordingly, it is recommended that Listed Building Consent be granted, subject to conditions.

This conclusion is the view of named Building Conservation Officer with the appropriate Cadw LBC delegation: *G. Arnall*.

10. DECISION

GRANTED WITH CONDITIONS

CONDITIONS:

1. The development shall be implemented in accordance with the following plans and documents:
 - Drawing Number 2321-101: *30, 32, 34 Clarence Place Location Plan*, received by the Local Planning Authority on 11/12/2025.
 - *HERITAGE IMPACT STATEMENT INCLUDING DESIGN & ACCESS STATEMENT for 30,32,34 Clarence Place, Newport WINDOW REPLACEMENT APPLICATION*, dated 10th December 2025.
 - Drawing Number 2321-B049: *Block A Clarence Place - existing GA elevations block B*, received by the Local Planning Authority on 23/12/2025.
 - Drawing Number 2321-B050: *Block A Clarence Place - prop GA elevations block B*, received by the Local Planning Authority on 23/12/2025.
 - Drawing Number 2321-A114: *Clarence Place - upvc casement window detail*, received by the Local Planning Authority on 02/03/2026.
 - *Proposed Timber Sliding Sash Window Details* drawing received 02/03/2026.
 - Example of Timber Sash Window Removed. Received 16/02/2026.
 - Example of Timber Sash Window Removed (2). Received 16/02/2026.
 - Example of Timber Sash Window Installed. Received 16/02/2026.
 - Example of Timber Sash Windows Installed (2). Received 16/02/2026.
 - Example of Sash Window Now Proposed for Removal. Received 16/02/2026.

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

INFORMATIVES:

- 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.