



HERITAGE STATEMENT

Project Name: 175A Commercial Street Project

Description: Internal Works Associated with the Implementation of the Approved Residential Conversion (Listed Building Consent)

Project Location: Unit 3, 175A Commercial Street Newport NP20 1JN



NOVEMBER 24, 2025

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Fig. 1 - Main entrance to the building marked in red.

1. INTRODUCTION

1.1 Purpose of this Statement

This Heritage Statement has been prepared to accompany a new Listed Building Consent application submitted in parallel with Section 73 Application 25/0706 for 175A Commercial Street, Newport. The Section 73 application seeks to vary approved plans and discharge conditions associated with the previously granted planning permission 22/0794 for the change of use from office accommodation to a 6-bedroom House in Multiple Occupation, and the corresponding Listed Building Consent 24/0348.

This updated Heritage Statement provides clarification on the internal works and shows compliance. It ensures that the revised proposals continue to respect the architectural and historic character of the curtilage-listed property while remaining consistent with the intent and principles of the originally approved scheme.

The document provides an assessment of the building's heritage significance, describes how the proposed internal works preserve that significance, and demonstrates that the technical solutions (including acoustic measures, secondary glazing, and internal partitions) accord with national and local conservation policies. No new external works or alterations to the principal façade are proposed, and the character and appearance of the listed fabric remain unaffected.

1.2 Location and Listed Status

The property forms part of the historic block of the Westgate Hotel on Commercial Street, located within Newport city centre. The property contains a flying freehold partially over 174 Commercial Street which is Grade II listed, forming part of the historic Westgate Hotel complex. The first-floor unit at 175A exists partly as a flying freehold element over the listed structure and therefore falls within the setting and curtilage considerations of the designated heritage asset.

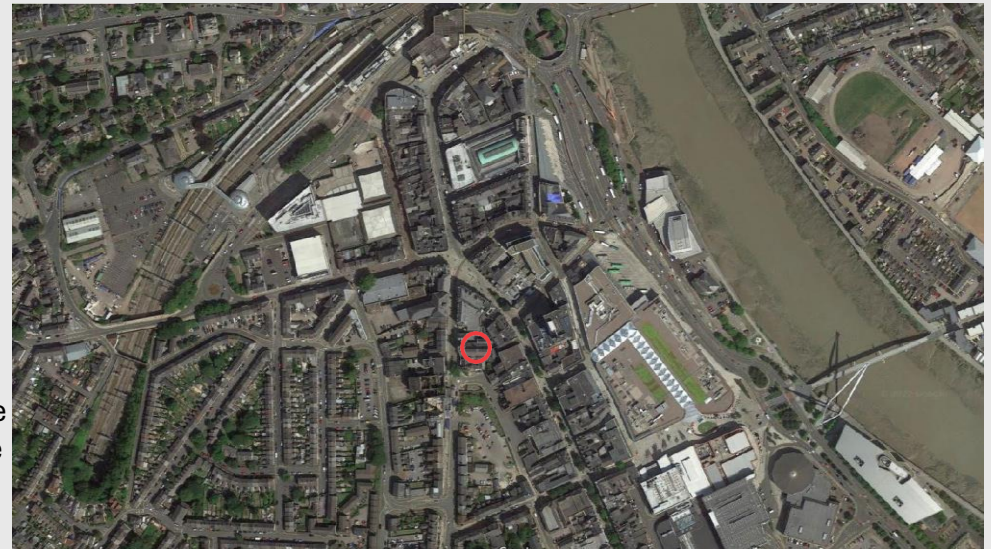


Fig. 2 - Aerial View from Google Earth

1.3 Scope of Works Covered by this Statement

This Statement concerns *only* the internal works required to deliver the approved residential use. These works include:

- Internal secondary glazing installed within existing window reveals
- Slimline acoustic ceiling treatments installed in the bedrooms
- Fire-rated doors and compliant internal partitions
- Careful internal routing of services to ensure no impact on historic fabric.

No external alteration, enlargement of openings, or changes to the principal elevation are sought within this submission.

1.4 Supporting Documentation

This Statement should be read in conjunction with:

- Section 73 Application 25/0706
- The accompanying Section 73 variation plans
- Section drawings
- Manufacturer datasheets for measures to be applied

Together, these documents demonstrate that the project adopts the principles of minimum intervention, and preservation of historic fabric, consistent with national conservation guidance.

2. HERITAGE CONTEXT & SIGNIFICANCE OF THE SITE

2.1 Historical Development of the Building and Surrounding Townscape

The building at 175A Commercial Street is located within the historic commercial core of Newport and lies within the curtilage of the Westgate Hotel, a Grade II listed building of major civic and architectural importance. While 175A itself is not individually listed, its proximity and historical association with the wider Westgate frontage give it contextual value within the streetscape.

The Westgate Hotel dates to the late 18th century and historically extended into adjoining plots along Commercial Street as Newport's town centre evolved. Over time, these neighbouring buildings, including the units now identified as 175 and 175A were adapted, subdivided, and altered to suit changing commercial needs. This pattern of incremental change is typical of town-centre heritage contexts, where buildings evolved organically while maintaining their role within the broader historic setting.

The significance of 175A lies primarily in its relationship to the listed Westgate Hotel and its contribution to the historic urban character of Commercial Street.



Fig. 3 - Historic street view of Commercial Street (1986), illustrating the town-centre context within which 175A sits. The image shows typical commercial-frontage development patterns that have evolved over time.



Fig. 4 - 1839 illustration of the Westgate Hotel, the primary listed building within whose curtilage 175A is located. This is included solely to provide contextual background on the evolution of the wider historic setting.

2.2 Evolution of Use

Consistent with Commercial Street's long history as Newport's primary shopping and civic thoroughfare, the unit now designated as 175A has accommodated a range of commercial tenants throughout the 19th and 20th centuries. These included:

- Jerome Photographic Studios – Part of the well-known nationwide photographic chain active in the 1930s–1950s, providing studio photography to the public. The Newport studio was a significant local hub prior to the company's merger with B. Bennett & Sons Ltd. in 1963 and eventual closure in the 1970s.

- Thompson Holidays / TUI Travel Shop – Occupying part of the combined premises during the late 20th and early 21st centuries, reflecting the rise of high-street travel agencies.
- Brook Street Bureau – A long-standing employment and commercial office agency operating from part of the building until the early 2020s.

Each of these uses demonstrates the building's ongoing role in providing adaptable spaces within the historic fabric of Newport's central business district.



Fig. 5 – Brook Street Agency in the early 2000s

2.3 Recent Condition and Need for Reinvestment

During the post-Covid period, much of the upper-floor space including 175A became vacant. Prolonged vacancy led to deterioration and under-utilisation, contrary to wider city-centre regeneration goals. Bringing the building back into sustainable residential use is consistent with national heritage policy, which recognises that ongoing occupation is one of the most effective forms of long-term heritage conservation.

The approved conversion to a 6-bed HMO supports:

- The retention and continued maintenance of the historic structure
- The economic and social revitalisation of the Commercial Street frontage
- The long-term viability of the heritage asset by providing a new, sustainable use

2.4 Architectural and Heritage Significance

Although the property has undergone adaptations over time, key features of heritage significance remain, including:

- Surviving period windows and external joinery features.
- Deep coffered ceilings within communal spaces
- The building contributes to the townscape context adjacent to the Westgate Hotel.
- Its role in the layered commercial history of Newport's principal high-street

These elements represent the architectural character and historic identity that the proposed internal works are designed to protect.

2.5 Summary of Significance

The special interest of 175A Commercial Street is derived from:

- Its position within the curtilage of the Grade II-listed Westgate Hotel, forming part of the wider historic setting
- Its gradual adaptation over time as part of the evolving commercial frontage of Commercial Street
- Its contribution to the established townscape character of the city centre

The building's internal spaces have been altered extensively through successive commercial uses. The proposed works have been designed to avoid harm, maintain townscape character, and support the continuing viable use of the building in line with approved consents.

3. THE PROPOSAL

3.1 Overview

This submission seeks Listed Building Consent for internal works only associated with the implementation of the already-approved change of use of 175A Commercial Street to a 6-bed HMO (C4). The works are limited to the first-floor internal fabric and associated internal building services required to deliver safe, compliant and acoustically suitable residential accommodation. No alterations are proposed to the principal and rear elevation or to the external character of the building facing Westgate Square/Commercial Street.

3.2 Objectives

- To deliver the consented residential use while safeguarding and preserving the special architectural and historic interest of the building and its setting within the Newport Town Centre Conservation Area.
- To meet the planning condition requiring internal acoustic performance without causing harm to historic fabric.
- To adopt the least-invasive, that retain and protect original features.

3.3 Scope of Proposed Internal Works

The main elements covered by this proposal are:

1. Secondary glazing (internal, bespoke) - slimline, Bespoke secondary units installed within existing reveals for noise mitigation. Fixings limited to reveal/ timber faces only, no alteration to principal external sashes or façades.
2. Selective slim acoustic ceiling linings - installed in the bedrooms to meet acoustic targets; deep coffered ceilings and principal communal ceilings will remain untouched. Where installed in the bedrooms, ceilings will use isolation systems (e.g., IsoMax clip or resilient bar / MF systems depending on headroom).
3. Internal partitions and doors -new timber stud partitions, FD30S fire doors and associated acoustic seals to comply with building regulations and the approved HMO layout. Fixings and door frames designed to avoid and preserve adjacent historic fabric.
4. Floor Retrofit- Floor acoustic retrofit using overlay/resilient systems as per submitted products.
5. Services & ventilation -mechanical extract, trickle ventilation and heating routed carefully. Where penetrations are unavoidable, they will be minimised, recorded, and made good with sympathetic materials.
6. Heritage protection-Works will follow standard good practice to avoid unintended damage to existing fabric.

3.4 Justification & Proportionality

- The works are proportionate to the need to deliver habitable rooms that comply with acoustic, fire safety and building regulations and to secure a viable long-term use for an otherwise vacant and deteriorating upper floor.
- The package combines non-invasive secondary glazing and targeted internal linings to avoid wholesale replacement of historic windows or ceilings. These solutions are consistent with conservation best practice.
- The retention of principal decorative elements and the absence of external alterations ensure that the special interest of the adjacent Grade II-listed Westgate Hotel and the character of the Conservation Area are preserved.

3.5 Methodology & Conservation Measures Statement

- Minimum intervention: interventions are limited to what is necessary to comply with the planning condition and building regulations.
- Record: A photographic record will be maintained for internal project records.

3.6 Heritage Benefits & Long-term Maintenance

- Reusing the existing fabric for a sustainable residential use will secure ongoing maintenance and investment in the building, preventing further vacancy-related decay.
- The proposed interventions allow the approved residential use to be implemented effectively without affecting the external heritage character and this supports the vitality of Commercial Street and Westgate Square.

4. HERITAGE POLICY FRAMEWORK

This section summarises the national and local policy and guidance considered in the assessment of heritage impact. The appraisal below is proportionate to the significance of the asset and the nature of the proposed internal works.

4.1 National Policy

- National Planning Policy (NPPF) -The submitted Heritage Statement follows the NPPF requirement to describe the significance of affected heritage assets and to assess the impact of proposals on that significance. The level of detail provided is proportionate to the asset's significance and sufficient for the Local Planning Authority to form an informed judgement. The statement demonstrates that the proposed internal interventions will avoid harm to the special interest of the building and its setting.

4.2 Local Policy & Design Guidance

- Newport Town Centre Conservation Area & Local Plan - The site lies within the Newport Town Centre Conservation Area and within the curtilage/setting of a Grade II-listed building. Local policy seeks to preserve historic character and supports proposals that secure the long-term conservation of heritage assets by re-use, provided harm is avoided or minimised. The project's

retention of principal external fabric limited internal change, and conservation-led methodology are consistent with these objectives.

- Supplementary Guidance (shopfronts, reinstatement and repair) - Where works affect or relate to historic elevations or shopfronts, local guidance expects retention, repair and reinstatement on a like-for-like basis where practicable. Although the current proposal includes no changes to the principal elevation, all external works to the rear (if any future works are required) will be informed by local guidance to retain or reinstate original features where identifiable.

4.3 Conservation Principles & Best Practice

This statement follows recognised conservation principles including:

- Significance-led approach - understanding and protecting elements that contribute to the building's established special interest.
- Least-restrictive intervention - The proposed solutions achieve fire and acoustic compliance within the approved layout.
- Recording-Photographic recording will be carried out as standard practice.

4.4 Compliance Statement

- The design approach demonstrates that the proposed works comply with the intent and spirit of national and local heritage policy: they are necessary to deliver a viable residential use, are proportionate, minimise harm and conservative detailing.
- The submission provides technical details proportionate to the works proposed.

5. ASSESSMENT OF IMPACT -Heritage-led Design Justification & Mapping

This section maps each proposed intervention to the specific heritage element(s) of special interest and explains the design, installation and monitoring measures that avoid, minimise or mitigate harm. For each intervention the impact rating is given (No Harm / Negligible / Minor / Neutral), with justification.

5.1 Window & Soldier Course Brick retention (Conditions 2 & 3 of LBC 24/0348)

Works / Change: Retention in situ of a rear timber casement window previously shown for replacement; no new openings or soldier course brick detail required.

Existing fabric: rear timber casement; rear façade fabric (less ornate but part of the building's historic sequence).

Impact rating: No Harm / Neutral (positive heritage outcome).

Justification & mitigation:

- Structural review showed removal of the adjacent load-bearing wall would reduce escape headroom to <2 m and breach Building Regs (Approved Document B). Retaining the wall preserves both safety and the historic fabric.
- The existing timber casement is sound and will remain unaltered, preserving original fabric and fenestration rhythm.
- Because no new openings are proposed, soldier course brick detailing (Condition 3) is not necessary; therefore Conditions 3 and 4 of the LBC 24/0348 are requested to be discharged on the basis the triggering works are no longer required.
- Controls: photographic record before works; measured surveys and retention.

5.2 Mechanical Extract Ventilation (MEV), grilles & trickle vents (Conditions 4 of LBC 24/0348)

Works: Centralised MEV for bathrooms/kitchen with internally routed ducting and rear-facing heritage-style grilles only; acoustic trickle vents integrated into secondary glazing for habitable rooms.

Existing fabric: rear elevation mortar joints (grilles), internal fabric at grille penetrations, external visual appearance at rear only.

Impact rating: Minor (rear) / Negligible.

Justification & mitigation:

- No principal façade penetrations: all habitable room background ventilation provided internally via secondary glazing trickle vents, preserving street-facing appearance.
- MEV outlets are positioned on the rear elevation using heritage-style grilles.
- Inline duct silencers (e.g., Titon SF Xtra) specified to control breakout noise and meet Condition 2 acoustic targets.

Net effect: Provides compliant ventilation and acoustic control while minimising visual and physical impact to heritage fabric.

5.3 Rainwater goods & soil pipes (Conditions 5 of LBC 24/0348)

Works: Internal SVP routing to existing rear SVP; retention of rear rainwater goods where possible or replacement in cast-iron-effect uPVC in heritage black for rear elevation only.

Existing fabric: rear gutters/downpipes.

Impact rating: Negligible / Minor (rear).

Justification & mitigation:

- No works to principal/front elevation rainwater goods; rear works limited and designed to match historic profiles using heritage-style materials to minimise visual impact.
- Internal boxed-in soil pipe routes with fire/acoustic lining prevent external visual interventions.

Net effect: Preserves principal façade integrity while providing modern drainage and maintenance benefits.

5.4 Secondary glazing (Conditions 6 of LBC 24/0348)

Works: Bespoke internal secondary glazing (Selectaglaze Series 42/46 or equivalent) (including curved/segmented bays) with acoustic trickle vents.

Existing fabric: timber bay windows, stained-glass transoms, window reveals.

Impact rating: Negligible / Neutral (protective).

Justification & mitigation:

- Secondary glazing installed within existing reveals preserves external appearance and original sashes. Frames use slimline fixings to timber reveals only, no trimming or removal of historic mouldings.
- Acoustic trickle vents are integrated into secondary frame heads to avoid external vents in principal façade.

Net effect: Improves acoustic performance while retaining and protecting original window fabric.

5.5 Slim / decoupled ceiling works (Conditions 6 of LBC 24/0348)

Works: Targeted ceiling linings in bedrooms using one of three systems depending on headroom: MF suspended, resilient bar, or IsoMax slim clip system. Coffered ceilings retained untouched.

Existing fabric: ceiling heights/volumes adjacent to bays.

Impact rating: Negligible- limited to localised height adjustments where required.

Justification & mitigation:

- Ceilings are limited to bedrooms only; principal coffered ceilings remain unaltered.
- IsoMax slim system selected where headroom constrained-designed with shadow gaps to avoid contact and to terminate prior to bay extensions to preserve visible mouldings.

Net effect: Acoustic improvement for bedrooms while conserving decorative ceiling elements.

5.6 Internal partitions & fire doors (walls) (Conditions 6 of LBC 24/0348)

Works: New timber/metal stud partitions with Rockwool infill and Gyproc SoundBloc linings; FD30S doors at escape and room entrances.

Existing fabric: internal plan form (minor).

Impact rating: Negligible / Neutral.

Justification & mitigation:

- Partitions are freestanding/lightweight and have no impact to the building Heritage.
- Fire doors and frames will be fitted with sensitivity to historic architraves; fixings minimised.

Net effect: Achieves Building Regulations and acoustic requirements efficiently.

5.7 Floor sound insulation- (Conditions 6 of LBC 24/0348)

Works: Floating timber batten system or resilient mat + overlay to achieve ≥ 53 dB DnT,w + Ctr between rooms and flats.

Existing fabric: existing floor build-ups (internal only).

Impact rating: Negligible / Neutral.

Justification & mitigation:

- All treatments are internal overlays or floating systems that do not require removal of historic floor elements or external fabric.
- Per specification, resilient perimeter isolation and edge details reduce flanking to historic walls and finishes.

Net effect: Achieves and exceeds acoustic targets without harm to heritage fabric.



Fig 6 - Showing retained rear window marketed with orange points



Fig 7- Showing load bearing wall with stairs springers marketed with orange points



Fig 8 - View from ground floor staircase and entrance



Fig9- View of the landing area that would serve as the communal lounge.



Fig 10- View of the existing 'Room 3'.



Fig 11 - View of the courtyard to the rear of Unit 3, depicting existing soil vent pipes and downpipes.

6. CONCLUSION

6.1 Summary of heritage outcome

- The package of internal measures proposed in the Section 73 variation and LBC submission, including window retention, bespoke internal secondary glazing, targeted slimline ceilings, high-performance separating partitions/floors, MEV with rear grilles, and heritage-style rear rainwater goods/soil routing, has been designed to deliver the approved 6-bed HMO while protecting the building's special architectural and historic interest.
- Interventions are proportionate and targeted to avoid any loss to principal historic features (bay windows, stained-glass transoms, and coffered ceilings).

6.2 Compliance with Conditions & Policy

- Variation of Condition 1 (plans): The revised floor plan and rear elevation drawings submitted under the Section 73 application capture the retained rear window and the updated internal arrangements. The development as varied will be implemented in accordance with the submitted documents
- **Discharge of Conditions 2–6:**
 - A. Conditions 2 & 3 (rear windows & soldier course): These are now redundant because the rear window remains in situ and no new openings are proposed; formal discharge is requested with supporting justification.
 - B. Condition 4 (MEV grilles): Product datasheets and images for the heritage-style rear MEV grilles have been provided.
 - C. Condition 5 (rainwater goods & soil pipe): Product specifications for the proposed rainwater goods and soil pipe components have been provided.
 - D. Condition 6 (sound insulation type & method): Product specifications for the proposed sound insulation systems have been provided.

6.3 Final statement

The interventions proposed under the Section 73 variation are necessary, carefully designed and justified to secure a sustainable residential use for a building within the curtilage of a Grade II-listed structure and within the Newport Town Centre Conservation Area. The measures are consistent with national and local heritage policy (NPPF / LDP SP9 / GP2 / GP7), embody conservation best practice (minimum intervention and recording), and provide practical solutions to meet statutory building and acoustic requirements without harm to significant historic fabric.