



Archaeoleg Morgannwg-Gwent

**Heneb**

Glamorgan-Gwent Archaeology

Our ref: NEW1609/MJ

## ARCHAEOLOGICAL PLANNING

Head of Planning and Economic Regeneration  
Newport City Council  
Civic Centre  
NEWPORT  
NP20 4UR

11th April 2024

Dear Sir

**Re: LBC: Conversion of Church to 9 flats:**  
**St Paul's Church, Commercial Street, Newport.**  
**Pl.App.No.: 24/0044**

Thank you for notifying us of this application; consequently we have reviewed the detailed information contained on your website. **The proposal will require archaeological mitigation.**

We have commented on application for 21/1272 in our letter dated 8<sup>th</sup> February 2022, and the application 24/0045 in our letter dated 20<sup>th</sup> October 2023, and our understanding of the archaeological resource remaining unchanged.

Information in the Historic Environment Record details that St Paul's Church was built in 1835 and is a rare example of a late Georgian church in the Early English style, re-furbished in 1859 and re-ordered in 1888. It is Grade II Listed (Cadw reference 3013), noted as at the time it was built as the only church within the town of Newport, with the freehold site being given by the Morgan family of Tredegar House. Whilst the church has undergone removal of some of the internal features, it retains many of those mentioned in the listing description and is noted as having a *broad, spacious undivided interior* (Cadw Listing Description). It also retains a west end gallery with iron columns. The stained glass is also noted.

Whilst we recognise the amendments made to the original proposal, and the removal of the proposed dormer, the changes proposed, whilst retaining the building as a structure, would remove the open internal physical and visual aspects of the original design.

Given our understanding of the existing building, and taking into account the proposals, we recommend that the development is mitigation by means of a condition.

Therefore, as before, we recommend that a historic building survey is made prior to any work commencing. We previously recommended that this takes the form of a Level 3 Survey as set out in *Understanding Historic Buildings: A Guide to Good Recording Practice* (Historic England 2016) and to an agreed Written Scheme of Investigation (WSI).

Cadeirydd / Chair: Dr Carol Bell

PSG / CEO: Richard Nicholls

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To ensure that work is carried out in a suitable manner, we therefore suggest that a condition worded in a manner similar to model condition 73 given in Welsh Government Circular 016/2014 is attached to any consent that is granted in response to the current application. This condition is worded:-

*No works to which this consent relates shall commence until an appropriate programme of historic building recording and analysis has been secured and implemented in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority*

The justification for the imposition of the condition would therefore be: -

*Reason: As the building is of architectural and cultural significance the specified records are required to mitigate impact.*

We also recommend that a note should be attached to the planning consent explaining that:

*The archaeological work must be undertaken to the appropriate Standard and Guidance set by Chartered Institute for Archaeologists (CIfA), [CIfA regulations, standards and guidance | Chartered Institute for Archaeologists](#) and it is recommended that it is carried out either by a CIfA Registered Organisation or a MCIfA level accredited Member [Looking for an archaeologist? | Chartered Institute for Archaeologists](#).*

If you have any questions or require further advice on this matter please do not hesitate to contact us.

Yours faithfully

*Mike Jones*

Mike Jones BA  
Assistant Stewardship Officer

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