



Coverack Road - Phase 2

Archaeological and Heritage Assessment

Prepared by:
**The Environmental Dimension
Partnership Ltd**

On behalf of:
Hedyn

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Contents

Executive Summary	4
Section 1 Introduction	8
Section 2 Legislation and Planning Guidance	19
Section 3 Methodology.....	28
Section 4 Baseline Information	32
Section 5 Impact Assessment	45
Section 6 Conclusions	50
Section 7 References	53

APPENDICES

Appendix EDP 1	Images
Appendix EDP 2	NCC Historic Buildings Conservation Officer Consultation
Appendix EDP 3	Coverack Road – Phase 1 Consultation with Glamorgan-Gwent Archaeology (Heneb)
Appendix EDP 4	Heritage Technical Note (edp8348_r002)

PLANS

Plan EDP 1: Designated Historic Assets (edp8348_d005c 24 April 2025 JFr/MBa)
Plan EDP 2: HER Records (edp8348_d001c 24 April 2025 DJo/MBa)
Plan EDP 3: Previous Events (edp8348_d006c 24 April 2025 JFr/MBa)
Plan EDP 4: Historic Maps (edp8348_d002c 24 April 2025 DJo/MBa)

Executive Summary

- S1 This Archaeological and Heritage Assessment for Hedyn was produced by The Environmental Dimension Partnership Ltd (EDP) to accompany a planning application for a residential development at Coverack Road - Phase 2, Newport ('the Site').
- S2 The Site does not contain any designated historic assets. Therefore, none will be physically affected by the Proposed Development within the Site.
- S3 In line with Cadw's Setting of Historic Assets in Wales (Cadw, 2017b), the assessment has considered the potential for impacts on the settings of designated historic assets beyond the Site.
- S4 The assessment concludes that the Proposed Development would replace derelict land adjacent to the Grade II* listed George Street Bridge (**25847**) with a modern residential development, in-keeping with existing building heights of other modern residential developments along the riverfront. The proposals would comprise a five-storey flat block, which would feature as the lowest residential development adjacent to the designated historic asset. The height of the Proposed Development would not compete with the height, scale or prominence of the bridge itself with its concrete masts or cables, nor impact on any positive setting elements within the bridge's surroundings (i.e. riverside walkways). As such, the Proposed Development would not result in an adverse change to the setting of the asset, and therefore, the Proposed Development would have no effect on the asset's heritage significance.
- S5 The Proposed Development has the potential to affect an incidental partial, limited view of the Grade I Transporter Bridge including E and W anchor chambers (**3076**) from the east end of the carriageway to George Street Bridge, above and adjacent to the Site. This view was identified to comprise one of many such distant views from within the wider Newport urban landscape setting, which makes no contribution to the asset's heritage significance. The loss of such a view from a small portion of the George Street Bridge towards the Transporter Bridge would result in no adverse setting effect to the Grade I Transporter Bridge including E and W anchor chambers (**3076**). Therefore, the Proposed Development would have no effect on the asset's heritage significance.
- S6 The Proposed Development has been identified to have no potential to adversely affect any aspect of the settings of the remaining surrounding designated historic assets, nor have the potential to impact the heritage significance of surrounding designated historic assets.
- S7 Overall, the Grade II* listed George Street Bridge and Grade I listed Transporter Bridge have been identified to be sensitive to change through development in the Site, however, the assessment concluded that neither designated historic asset would be adversely affected by the Proposed Development. Remaining designated historic assets located beyond the Site boundary are not considered to be sensitive to change from development within the Site.
- S8 With regards to archaeological remains, the archaeological potential of the Site has been deduced from repositories of information outlined in **Section 3**.

- S9 The assessment concludes the Site has a very low potential for prehistoric through to medieval remains. This is based on the following: the absence of previously recorded remains; the recorded depth of alluvial deposits with the potential to contain archaeological remains, located below thick deposits of made ground within the Site; and the historic landscape character of the Site comprising a historic wetland environment, frequently subject to inundation until land drainage and reclamation occurred during the late post-medieval period.
- S10 The Site's archaeological potential is focused on a high potential for late post-medieval 19th century and modern 20th century structural remains (i.e. floor surfaces, walls, demolition rubble and/or foundations), associated with its former industrial storage use and later 'Uskside Paint Mills' site. Such remains would be of negligible heritage significance for late 19th century remains and no historic interest or heritage significance for modern 20th century remains.
- S11 Consultation with Heneb for Coverack Road - Phase 1, located to the north-west of the present site, suggested that there was no suitable mitigation for the impact of that development's piled foundations and so no archaeological monitoring was deemed necessary in that instance. As the current proposals will be utilising the same construction methods, there would be no appropriate way of monitoring the groundworks associated with the Proposed Development's piling within the Site.
- S12 Therefore, in light of the proposed construction methodology, in combination with the very low archaeological potential of the Site and the fact that no archaeological remains of significance are likely to be adversely affected there should be no need for any archaeological mitigation in respect of the development proposals for the Site.

Crynodeb Gweithredol

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- S1 Cynhyrchwyd yr Asesiad Archeolegol a Threftadaeth hwn ar gyfer Hedyn gan EDP i gyd-fynd â chais cynllunio ar gyfer datblygiad preswyl yn Coverack Road - Cam 2, Casnewydd ('y Safle').
- S2 Nid yw'r Safle'n cynnwys unrhyw asedau hanesyddol dynodedig. Felly, ni fydd unrhyw asedau o'r fath yn cael eu heffeithio'n ffisegol gan y Datblygiad Arfaethedig o fewn y Safle.
- S3 Yn unol â chanllawiau Lleoliad Asedau Hanesyddol yng Nghymru (Cadw, 2017b), mae'r asesiad wedi ystyried potensial y datblygiad i effeithio ar leoliadau asedau hanesyddol dynodedig y tu hwnt i'r Safle.
- S4 Daw'r asesiad i'r casgliad y byddai'r Datblygiad Arfaethedig yn disodli'r tir diffaith gerllaw Pont George Street (**25847**), sy'n heneb restredig Gradd II*, gyda datblygiad preswyl modern, a fydd yn cyd-fynd ag uchder adeiladau presennol datblygiadau preswyl modern eraill ar hyd glan yr afon. Byddai'r cynigion yn cynnwys bloc o fflatiau pum llawr, a dyma fyddai'r datblygiad preswyl isaf gerllaw'r ased hanesyddol ddynodedig. Ni fyddai uchder y Datblygiad Arfaethedig yn cystadlu ag uchder, graddfa nac amlygrwydd y bont ei hun gyda'i mastiau concrit neu geblau, nac yn effeithio ar unrhyw elfennau cadarnhaol o fewn amgylchoedd y bont (h.y. llwybrau glan yr afon). Yn hynny o beth, ni fyddai'r Datblygiad Arfaethedig yn arwain at newid andwyol i leoliad yr ased, ac felly, ni fyddai'r Datblygiad Arfaethedig yn cael unrhyw effaith ar arwyddocâd yr ased o ran treftadaeth.
- S5 Mae gan y Datblygiad Arfaethedig y potensial i effeithio ar olygfa gyfyngedig, rannol o'r Bont Gludo Gradd I gan gynnwys siambrau angori'r Dwyrain a'r Gorllewin (**3076**) o ben dwyreiniol y gerbyttfordd i Bont George Street, uwchben a gerllaw'r Safle. Nodwyd bod yr olygfa hon yn un o sawl golygfa bell debyg o fewn tirwedd trefol ehangach Casnewydd, nad yw'n cyfrannu o gwbl at arwyddocâd yr ased o ran treftadaeth. Ni fyddai colli golygfa o'r fath o ran fechan o Bont George Street tuag at y Bont Gludo yn arwain at unrhyw effaith andwyol ar leoliad y Bont Gludo Gradd I gan gynnwys siambrau angor y Dwyrain a'r Gorllewin (**3076**). Felly, ni fyddai'r Datblygiad Arfaethedig yn cael unrhyw effaith ar arwyddocâd yr ased o ran treftadaeth.
- S6 Nodwyd nad oes gan y Datblygiad Arfaethedig unrhyw botensial i effeithio'n andwyol ar unrhyw agwedd ar leoliadau gweddill yr asedau hanesyddol dynodedig o'i amgylch, ac nad oes ganddo ychwaith y potensial i effeithio ar arwyddocâd yr asedau hanesyddol dynodedig cyfagos o ran treftadaeth.
- S7 Yn gyffredinol, nodwyd bod Pont restredig gradd II* George Street a'r Bont Gludo restredig Gradd I yn sensitif i newid drwy'r datblygiad ar y Safle, fodd bynnag, daeth yr asesiad i'r casgliad na fyddai'r Datblygiad Arfaethedig yn cael effaith andwyol ar yr un o'r ddwy ased hanesyddol ddynodedig. Nid ystyrir bod yr asedau hanesyddol dynodedig sydd wedi 'u lleoli y tu hwnt i ffin y Safle yn sensitif i newid yn sgil datblygiad o fewn y Safle.

- S8 O ran olion archaeolegol, mae potensial archaeolegol y Safle wedi'i asesu o'r storfeydd o wybodaeth a amlinellir yn **Adran 3**.
- S9 Daw'r asesiad i'r casgliad mai bach iawn yw'r potensial bod olion cynhanesyddol i ganoloesol ar y Safle. Mae hyn yn seiliedig ar absenoldeb olion a gofnodwyd yn flaenorol, dyfnder y dyddodion llifwaddodol archaeolegol a gofnodwyd, sydd islaw'r dyddodion trwchus o dir artiffisial o fewn y Safle, a chymeriad tirwedd hanesyddol y Safle sy'n cynnwys amgylchedd gwlyptir hanesyddol, a oedd yn dioddef llifogydd cyson nes i'r tir gael ei ddraenio a'i adfer yn ystod diwedd y cyfnod ôl-ganoloesol.
- S10 Mae potensial archaeolegol y Safle yn canolbwyntio ar botensial mawr bod yno olion strwythurol ôl-ganoloesol o ddiwedd y 19eg ganrif ac olion strwythurol modern o'r 20fed ganrif (h.y. arwynebau lloiau, waliau, rwbwl yn sgil gwaith dymchwel a/neu sylfeini), yn gysylltiedig â'i ddefnydd blaenorol fel storfa ddiwydiannol ac, yn ddiweddarach, fel safle ar gyfer y cwmni 'Uskide Paint Mills'. Prin fyddai arwyddocâd olion o ddiwedd y 19eg ganrif o ran treftadaeth ac ni fyddai unrhyw ddiddordeb hanesyddol nac arwyddocâd o ran treftadaeth i olion modern o'r 20fed ganrif.
- S11 Mae ymgynghoriad â Heneb ar gyfer Coverack Road – Cam 1, sydd wedi'i leoli i'r gogledd-orllewin o'r safle presennol, yn awgrymu nad oedd unrhyw fesurau lliniaru addas ar gyfer effaith sylfeini pileri y datblygiad hwnnw ac felly ni thybiwyd bod angen unrhyw waith monitro archaeolegol yn yr achos hwnnw. Gan y bydd y cynigion presennol yn defnyddio'r un dulliau adeiladu, ni fyddai unrhyw ffordd briodol o fonitro'r gwaith daear sy'n gysylltiedig â gosod pyst ar gyfer sylfeini'r Datblygiad Arfaethedig o fewn y Safle.
- S12 Felly, yng ngoleuni'r fethodoleg adeiladu arfaethedig, ynghyd â photensial archaeolegol bach iawn y Safle a'r ffaith nad oes unrhyw olion archeolegol o bwys yn debygol o gael eu heffeithio'n andwyol, ni ddylai fod angen cymryd unrhyw gamau lliniaru archaeolegol mewn perthynas â'r datblygiad arfaethedig ar gyfer y Safle.

Section 1 Introduction

- 1.1 This Archaeological and Heritage Assessment has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Hedyn (hereafter referred to as 'the Client'), to accompany a planning application for a residential development (i.e. 'the Proposed Development') at Coverack Road – Phase 2, Newport (hereafter referred to as 'the Site').
- 1.2 The first aim is to assess whether, how and to what extent designated historic assets within the wider environs of the Site derive 'heritage significance' from their setting. Consideration is then given as to whether the Proposed Development would change the setting of any historic assets, such that there might be an effect on their heritage significance. Following this, the nature and magnitude of any impacts arising in that respect are determined.
- 1.3 The second aim of this assessment is to consider the available historical and archaeological resources for the Site, and to establish, as far as possible, the nature and significance of any known or potential archaeological features, deposits or remains within the Site, as well as historic buildings. This is undertaken in accordance with Welsh Government guidance set out in Planning Policy Wales (PPW 12, Welsh Government (2024a)), Technical Advice Note 24 (TAN 24, Welsh Government (2017)) and relevant local planning policy for the conservation and management of the historic environment. Once established, the nature and magnitude of any impacts on them resulting from the proposals is determined.
- 1.4 The report employs Welsh Government guidance in PPW 12 and TAN 24 as well as best practice guidance from Cadw detailed in the following documents:
- Heritage Impact Assessment in Wales (Cadw 2017a);
 - Setting of Historic Assets in Wales (Cadw 2017b); and
 - Managing Conservation Areas in Wales (Cadw 2017c).
- 1.5 These three documents have been used to investigate the archaeological and heritage issues at the Site and to provide a robust evidence base, which will aid the determination of the planning application.
- 1.6 In accordance with best practice guidance, desktop sources have been augmented through two site walkovers undertaken in March 2024 and September 2024. Images obtained from the site walkovers to assist with the establishment of the historic environment baseline of the Site and to support the report's setting assessment, are presented in **Appendix EDP 1**.
- 1.7 The Archaeological and Heritage Assessment takes into consideration and addresses, where relevant, commentary provided by the Historic Building Conservation Officer (HBCO) to Newport City Council (NCC) on 19 July 2024. Comments were provided in response to a pre-application consultation request for the Proposed Development submitted 15 May 2024. The HBCO's comments are presented in **Appendix EDP 2**.

- 1.8 Additional consultation with NCC on heritage matters occurred in October/November 2024. This is described further below and a Heritage Technical Note produced following this consultation is located at **Appendix EDP 4**.

SITE DESCRIPTION

- 1.9 The Site comprises brownfield land within Newport's urban cityscape, situated along the east bank of the River Usk. The Site has open views directly across the River Usk to the south-west. The Site is approximately 0.1911 hectares (ha) in extent and is centred on National Grid Reference (NGR) 331995, 187759.
- 1.10 The brownfield land within the Site consists of an area of derelict hardstanding surfaces with rubble spoil heaps and overgrown vegetation with self-seeded shrubs along the Site's edges. The Site's boundaries also feature a modern metal fence (**Image EDP A1.1** and **Image EDP A1.2**) although the verges of Coverack Road to the east and south are also included within the Site.
- 1.11 The Site is bound by a private driveway to the car park associated with the now built Coverack Road – Phase 1 (i.e. 'Galliford's Yard') residential development to the north of the Site; Coverack Road to the east and south of the Site; and the car park associated with Coverack Road – Phase 1 residential development to the west of the Site. Meanwhile, the Grade II* listed George Street Bridge (**25847**), which carries the B4237, is situated adjacent and above to the west/north-west of the Site.
- 1.12 The Site's urban environment is reflected by a range of modern residential and commercial developments present within its surroundings. Elements of the Site's urban environment include, but are not limited, to the following:
- Two-storey early 20th century residential terraced streets to the north (e.g. Cyril Street, Morris Street, Coverack Road, Witham Street and Feering street);
 - Mid-late 20th century onwards commercial properties to the east (e.g. Pink Self Storage Newport, Klevedon Business Centre and commercial properties along Klevedon Street);
 - A two-three storey modern early 2000s semi-detached residential development along Argosy Way to the south-east of the Site. The side and/or rear elevation of these properties front onto the River Usk;
 - Three-six storey modern c.2010 built flat blocks, adjacent to the Usk Way roundabout, Jack's Pill and East Dock Road (e.g. Selskar Court – River Front) to the south of the Site. The side elevation of these properties front onto the River Usk;
 - A seven-storey modern late 2000s flat block (i.e. Newport Student Village) along the west bank of the River Usk, situated adjacent to the Grade II* George Street Bridge (**25847**) and to the south-west of the Site. The rear elevation of the flat block fronts onto the River Usk;
 - The approximately three-storey 1996 built recreational 'Castel Bingo' property along the west bank of the River Usk, situated adjacent to the Grade II* George Street Bridge

(**25847**) and to the south-west of the Site. The side elevation of the property fronts onto the River Usk;

- The early 2020s built Coverack Road – Phase 1 residential development located to the north-west of the Site adjacent to the other side of the Grade II* listed George Street Bridge (**25847**). The Phase 1 development comprised a five-storey flat block (i.e. Tramway House) and six-storey flat (i.e. Bankside House). The front elevation of both flat blocks front onto the River Usk;
- Further four-storey early 2010s built residential flat blocks along the east bank of the River Usk, located to the north-west of the Site. Flat blocks include, Westonia House, Devonian House, Britannia House and The Cambria. The front elevation of each block fronts onto the River Usk;
- The 1980s built Newport Transport bus station, located beyond Cyril Street and Coverack Road – Phase 1 residential development to the north-west of the Site; and ; and
- The 1964 built Grade II* listed George Street Bridge (**25847**), located adjacent to the west/north-west of the Site.

Geology

- 1.13 According to the British Geological Survey (BGS), the Site's bedrock geology comprises the St. Maughans Formation – Interbedded argillaceous Rocks and (subequal/subordinate) sandstone. The bedrock formation formed between 394.3-419 million years ago (Mya). Overlying superficial deposits recorded within the Site comprise Tidal Flat Deposits of clay and silt, deposited over the previous two million years by waters inundating a former shoreline environment (BGS, 2024).

Previous Geotechnical Site Investigations (SIs)

2008 Tweedie Evans Consultancy Limited (TEC) Geotechnical GI (TEC, 2008)

- 1.14 A preliminary geoenvironmental and geotechnical assessment was undertaken in 2008 by TEC for the land contained within the Site, to support previous planning application reference 10/1087 to Newport City Council (NCC).
- 1.15 The GI comprised seven trial pits and two boreholes. The logs of the trial pits and boreholes established outline the following general stratigraphic sequence from top to bottom:
- Made ground c.3.3 – 4.6m in depth. Multiple made ground deposits described;
 - Alluvial estuarine deposits c.1.2m in depth, consisting of soft dark green to grey clay with pockets of sand;
 - Alluvial estuarine deposits c.9.4m in depth, consisting of soft dark green to grey clay;
 - Alluvial estuarine deposits c.1.9m in depth, consisting of dark grey clayey gravel;

- Fluvial deposits c.0.5m in depth, consisting of medium density grey brown and grey sand;
- Fluvial deposits c.2.7m in depth, consisting of very dense gravel and cobbles with purple brown mudstone and sandstone; and
- Bedrock, recorded up to c.5m in depth, consisting of red brown to brown blue-grey mudstone.

2018 Terra Firma Geotechnical GI (Terra Firma, 2018)

- 1.16 A more recent geotechnical SI was undertaken in 2018 by Terra Firma, for the now built residential development of Coverack Road – Phase 1 (Terra Firma, 2018). This included the associated car park to Phase 1, located adjacent to the Site’s north-west boundary.
- 1.17 The geotechnical SI established a general stratigraphic sequence, derived from seven windowless sampling boreholes, four trial pits and six cable percussive boreholes. The general stratigraphic sequence from top to bottom, established for Coverack Road – Phase 1 according to Terra Firma’s report, comprises the following:
- Made ground 4.3 – 5.4m in depth. Made ground deposits described as ‘*Variable and vertically and laterally inconsistent bands of loose to very loose SAND and/or GRAVEL, loose black or grey ASH, and soft to firm CLAY*’;
 - Alluvial estuarine deposits c.1.1 – 2.1m in depth, consisting of grey/brown mottled clay;
 - Alluvial estuarine deposits c.7.2 – 9.2m in depth, consisting of soft grey clay;
 - Alluvial estuarine deposits c.1.5 – 1.8m in depth, consisting of grey clayey gravel;
 - Fluvial deposits c.2.5 – 3.5m in depth, consisting of dense brown sand;
 - Fluvial deposits c.1.1 – 1.4m in depth, consisting of dense brown sandy gravel; and
 - Sandstone bedrock from c.20.3 – 21.3m in depth.

- 1.18 The 2018 geotechnical SI’s results broadly reflect that of the Site’s 2008 survey as well as the nearest borehole log recorded on the BGS (i.e. Log Reference ST38NW73), located c.240m to the north-west of the Site. This suggests that the general stratigraphic sequence established for both the Site and adjacent Coverack Road – Phase 1 are typical for the locality and notably comprise significant deposits of modern made ground overlying alluvial deposits.

English Heritage - Severn Estuary Rapid Coastal Zone Assessment Survey, National Mapping Programme (Crowther & Dickson, 2008)

- 1.19 Alluvial deposits on the wider Gwent Levels (of which the estuary of the River Usk is a part), and surrounding estuaries around the Severn have occasionally been the source of well-preserved archaeological finds, some of which have been of high significance.

Archaeology, from the prehistoric and Roman periods, can be buried at substantial depth within the alluvial sequence.

- 1.20 The pattern of alluvial deposition in the Severn Estuary has been caused by fluctuating sea levels, with layers of clay settling during times of high sea level, or marine transgressions, and peats being formed during times of low sea level (Crowther & Dickson, 2008). A broad depositional model has been devised for these zones (known as the 'Wentlooge Formation'), dividing the sediments (mainly derived from saltmarshes) into several horizons, summarised in **Table EDP 1.1** below:

Table EDP 1.1: Simplified drift geological sequence around the Severn Estuary (Rippon, 1997)

Unit	Description
I	Topsoil
II	Desiccated layer/brown clay
III	Upper blue clay (upper part of Wentlooge Formation)
IV	Peat/clay layer (middle part of Wentlooge Formation)
V	Lower blue clay (lower part of Wentlooge Formation)
VI	Basal sands/gravels/peats
VII	Bedrock

- 1.21 Units V and VI were deposited above the solid bedrock in the early post-glacial period. Basal peats of Unit VI have been dated to c.5000 BC to c.4500 BC (Kidson & Heyworth, 1973; Kidson & Heyworth, 1976; Rippon, 1997). These were subsequently overlain by the clays of Unit V, the lower part of the Wentlooge Formation, deposited during a major marine transgression associated with the post-glacial rise in sea level. This Lower Wentlooge Formation is primarily thick silt, with no or very thin peat deposits, and dates to around the Mesolithic/Neolithic Period (Crowther & Dickson, 2008).
- 1.22 A complex of mixed peat and alluvium (Unit IV in above table, the middle part of the Wentlooge Formation) developed across the Severn Estuary Levels between 3600-1000 BC (Rippon, 1997). This formed as a result of the gradual drying of the wetland environment and the subsequent plant colonisation, and has resulted in thick bands of peat deposits, interspersed with deposits of silt and clay from short floods. The last period of widespread peat formation seems to have been towards the end of the Bronze Age.
- 1.23 The mixed peat/alluvium horizon is overlain by a second, thick layer of thick, pale green estuarine silty clay deposited under marine conditions (Unit III in the above table, the upperpart of the Wentlooge formation; Rippon, 1997). The last major marine transgression seems to have begun in the late 2nd to early 1st millennium BC, reaching its greatest extent by around 500 BC. Marine transgressions mean that marine conditions would have been present across much of the levels for the Iron Age (Rippon, 1997: 43-4), although localised areas of higher ground may have been present within a saltmarsh environment.
- 1.24 The stratigraphic sequence established by the geotechnical SI for the Site and Coverack Road – Phase 1, indicates that it is likely that, at least for this locality, given the clay nature of the alluvium, and lack of peat deposits, that, prior to historical drainage, the Site was

located in an area entirely subject to inundation. The archaeological implications of this are considered in the assessment below.

Topography

- 1.25 With regards to the Site's topography, the Site is relatively uniform in level at approximately 8m above Ordnance Datum (aOD). The surrounding area is also flat and low-lying, consisting of reclaimed land along the estuary of the River Usk.

PLANNING CONTEXT – THE SITE AND OTHER LAND PARCELS ADJACENT TO GRADE II* GEORGE STREET BRIDGE

Land Contained within the Site

Outline Planning Application 10/1087, Resubmission 12/0666 and Appeal APP/G6935/A/14/2229585

- 1.26 A previous planning application for the Site was submitted for outline planning permission in October 2010 (NCC Planning Reference: 10/1087) and resubmitted in February 2012 (NCC Planning Reference: 12/0666), for a fourteen-storey residential flats building and bridge connection to the Grade II* George Street Bridge (**25847**).
- 1.27 The HBCO to NCC at the time concluded in their consultation response for both applications that the proposed development would not affect any important aspect of the bridge's setting. Furthermore, the HBCO added that “*..whilst the new development will affect views of the bridge and seem likely to detract from its qualities as a landmark, the reasons for listing relate to its engineering excellence; such qualities would still be fully appreciated*”.
- 1.28 The proposals for the fourteen-storey residential flats building were ultimately refused and later dismissed at appeal in April 2015, under planning application APP/G6935/A/14/2229585, over the following main issues:
- *“The character and appearance of the area;*
 - *The setting of the adjacent Grade II* listed building [i.e. George Street Bridge]; and*
 - *The living conditions of neighbouring residents having particular regards to any overshadowing effects and privacy.”*
- 1.29 With regards to the setting of the Grade II* listed George Street Bridge the Planning Inspector argued that the scale and mass of the proposed fourteen-storey building would be significantly larger than the form of the bridge's masts and would visually compete with the bridge. Such change was harmful to the prominence of the bridge, which was considered to be a vital component of defining its significance. Moreover, the assessment was as follows:
- “The bridge has a major visual impact on the townscape in Newport being a dominating and visually distinctive landmark feature over much of the city. The appellants contend that the setting of the bridge is of relatively minor significance as it has been listed by virtue of*

being an example of a particular building type or technique rather than on its aesthetic design quality and that these qualities would still be appreciated. The Council concurs with this view although accepts that the development would affect views of the bridge and detract from its qualities as a landmark. I consider that the bridge's engineering excellence and qualities are appreciated through its setting with a visual prominence largely attributed to its elevation over a wide span of open water and its clear definition as a cable stayed bridge with its supporting vertical masts rising high above the surroundings.

I am satisfied that the relatively low heights of the two, five and seven storey elements of the proposal would not cause harm to its setting. However, the fourteen storey element would be situated in close proximity to the north east mast and extend close to the height of the tallest cable stay where it meets the concrete mast. The scale and mass of this element of the development would be significantly larger than the slender form of the masts and would visually compete with the bridge. I find this would be harmful to the stand alone prominence of the bridge and which is a vital component of defining its significance. I also note that Cadw's Inspector of Historic Buildings has a similar view.

I conclude that the proposal would have an unacceptable impact on the setting of the Grade II listed building and would not be in accord with the relevant LDP policy SP9."*

- 1.30 As such, the previous fourteen storey building proposals within the Site was refused due to the impacts caused by its height in relation to the character and appearance of the area, setting of the Grade II* listed building and effects on habitants in the surrounding area. It should be noted that in arriving at this conclusion Appeal Decision APP/G6935/A/14/2229585 also determined that building heights of up to seven storeys within the site would not harm the Grade II* listed bridge.

Pre-application Consultation PRELET/P/20/00044 and PRELET/P/21/0161

- 1.31 Pre-application Consultation requests were submitted for proposals for a five-storey residential flats building within the Site in March 2020 (i.e. PRELET/P/20/00044) and June 2021 (i.e. PRELET/P/21/0161), respectively. A formal response by NCC was provided July 2020 for PRELET/P/20/00044.
- 1.32 The July 2020 response did not relay any direct comment from the NCC's HBCO or from Cadw regarding the potential for any effect on designated historic assets from the proposed five-storey building, notably in relation to the adjacent Grade II* listed George Street Bridge. Nonetheless, the response did reference the bridge in the Landscape Officer's comments, which suggests a favourable opinion of the development from the Council. This stated that:

"It is expected that the development will make a positive contribution to the landscape and riverfront by providing a high-quality design which will respect Grade II listed George Street Bridge."*

Coverack Road – Phase 1

Detailed Planning Application 18/1169

- 1.33 A detailed planning application for Coverack Road – Phase 1 located to the north-west of the Site, on the other side of the Grade II* listed George Street Bridge. The application

comprised a five-storey flat block (i.e. Tramway House) and six-storey flat (i.e. Bankside House), submitted in November 2018 and approved January 2019 (NCC Planning Reference: 18/1169). The six-storey building is located immediately adjacent to the bridge, approximately 11.5m at its nearest point to the edge of the bridge's walkway.

- 1.34 A Heritage Impact Assessment was undertaken in 2018 by EDP (edp5080_r001) to accompany proposals for the permitted and now built residential development (EDP, 2018). Commentary provided by the HBCO at the time for the application noted that the application was *"supported by a comprehensive Heritage Impact Assessment. The statement concludes that the development would preserve the setting of the adjacent grade II* listed George Street Bridge and I am happy to concur with this. As such, I have no objection"*.
- 1.35 With regards to commentary provided by the NCC planning committee for the application, it was noted that *"the applicant has ensured that the scale of the buildings adjacent to the Grade II (sic) listed George Street Bridge respects the setting of the bridge and its surroundings"*. They also issued the below comments:

"The Riverfront is fast developing into a modern and contemporary feature of the City which is promoted by urban regeneration aspirations. It is considered that the siting of modern buildings adjacent to the bridge on the west bank of the river has not detracted from the setting or presence of the bridge as a listed structure and as a well-known feature of central Newport. The proposed development is considered to be an improvement compared to the current poor-quality buildings."

Castle Bingo Uskway

Detailed Planning Application 94/1142

- 1.36 An application for the 1996 built approximately three-storey Castle Bingo Uskway commercial property, located on the west side of the River Usk and adjacent to the north-west of the Grade II* listed George Street Bridge (**25847**), was submitted in December 1994 and approved April 1995 (NCC Planning Reference: 94/1142). No commentary is available for the development's application, however, the development pre-dated the designation of the bridge as a listed building and therefore a historic asset of national importance in October 2001.

Newport Student Village

Detailed Planning Application 06/1516

- 1.37 A detailed planning application for the 2010 built Newport Student Village flats building, located on the west bank of the River Usk and adjacent to the north-west of the Grade II* listed George Street Bridge, was submitted in December 2006 and approved April 2007 (NCC Planning Reference: 06/1516). The application comprised a 441 bed, seven-storey flats block.
- 1.38 No comment was provided from the HBCO at the time in relation to the development's proposals, however, 'no concern' was raised by Cadw in relation to built heritage matters.

Planning Context Summary

- 1.39 The planning context outlined for the land parcels immediately adjacent to the Grade II* George Street Bridge illustrates the degree of modern redevelopment and therefore change that has occurred to the immediate surroundings of bridge along the riverfront to the River Usk in recent decades. Such change has been observed as a positive change the urban townscape within Newport.
- 1.40 Given the planning history of the Site and the other land parcels adjacent to the George Street Bridge the River Usk outlined above, it is considered that a modern residential development in principle within the Site should not be considered detrimental to the setting of the Grade II* listed George Street Bridge.
- 1.41 The Proposed Development would consist of a multi-storey residential building of similar height to those of permitted and built out modern buildings adjacent to the Grade II* listed George Street Bridge (**25847**). Furthermore, the Proposed Development is of a much lower height than the previously refused fourteen-storey flats building for the Site. This would avoid the potential to introduce such harm identified for the previous application at appeal (i.e. Appeal Reference: APP/G6935/A/14/2229585). In that, the height, scale and massing of a five-storey block within the Site would not visually compete with the bridge's mast or be harmful to the prominence of the bridge from within its immediate setting, consistent with the Appeal Decision that determined that building heights of up to seven storeys within the site would not harm the Grade II* listed bridge.
- 1.42 The planning context set out above is considered when undertaking the setting assessment for the Grade II* listed George Street Bridge below.

PROPOSED DEVELOPMENT

- 1.43 The Proposed Development comprises a single residential flats block, five storeys in height and oriented north-west to south-east, as well as associated hardstanding areas and landscaping. The proposals also provide for street-side placemaking and landscaping improvements along Coverack Road and provision for a heritage information board on Coverack Road that provides information on the Grade II* listed building George Street Bridge.
- 1.44 The description of the Proposed Development is as follows:
- “Full planning application for the development of 40no. affordable homes (flat) units and associated works, including parking and landscaping.”*

CONSULTATION

Newport City Council Historic Building Conservation Officer

- 1.45 The HBCO to NCC provided commentary on 19 July 2024 in response to a pre-application consultation request submitted 15 May 2024 for the Proposed Development (set out in full in **Appendix EDP 2**). The HBCO outlined that although they do not object to the Site's

redevelopment in principle and acknowledge that the setting to the Grade II* listed George Street Bridge has been altered by modern riverside development, several concerns with the proposals were raised. These are summarised into two main issues:

- Design Matters with regards to the proximity, massing, scale, height and orientation of the proposed flats block; and
- Potential harm to the setting of the adjacent Grade II* listed George Street Bridge and Grade I listed Transporter Bridge, located c.1.4km south of the Site.

- 1.46 The assessment provided in this report has also been revised following the commentary from the HBCO.
- 1.47 Concerns raised with regards to design matters are not directly addressed in this report, with an updated impact assessment presented in relation to the current design proposals.
- 1.48 Concerns raised with regards for the potential for the Proposed Development to introduce an adverse change to the setting of the two highlighted designated historic assets is addressed in the setting assessment and impact assessment for the Proposed Development of this report, below.

Further consultation October/November 2024

- 1.49 Following the re-issue of the report, a meeting was held on 23rd October 2024 between the HBCO and the NCC case officer and the project team at which the revised assessment was discussed. Following this meeting, an additional set of visualisations showing the proposals was issued to the NCC officers in order to provide additional information to supplement the assessment. An email was issued by NCC in response to the visualisations submitted by the applicant on 28th November 2024.
- 1.50 The NCC email reiterated the position of the officers, as previously expressed in respect of the effect of the proposals on the setting and significance of the Grade II* listed building George Street Bridge. In response, a detailed revision and reiteration of the setting assessment has been produced as a Heritage Technical Note. This note is appended to the present report at **Appendix EDP 4**.

Glamorgan-Gwent Archaeology (Heneb)

- 1.51 Consultation with regards to archaeological matters for Coverack Road – Phase 1 with Glamorgan-Gwent Archaeology (Heneb), was undertaken through the planning application process. In May 2019, Heneb provided comment with regards to archaeological fieldwork requirements for Coverack Road – Phase 1 (set out in full in **Appendix EDP 3**). Given the proximity of the adjacent development site, some of their comments are considered relevant to the current application for the Site (i.e. Coverack Road – Phase 2). The comments of relevance are summarised below.
- 1.52 It was outlined how the site boundary for Coverack Road – Phase 1 is located on the alluvial flood plain of the River Usk, and thus has potential for waterlogged, organic archaeological material to be preserved within it. Such remains have the potential to be of national importance. This observation also applies to the land contained within the Site. However, it

was noted that the Phase 1 site (and by extension the Site for the Proposed Development) is not located adjacent to any recorded 'pills' or other natural features at the time of the production of the EDP produced 2018 Heritage Impact Assessment (report reference: edp5080_r001), that might have provided a focus for settlement.

- 1.53 A pre-determination archaeological evaluation of the Phase 1 site was not requested. It is assumed that Henneb's position would be similar for the Site (i.e. Phase 2).
- 1.54 Henneb at the time, recommended a watching brief during all exploratory works, and also that the applicant should carefully consider the advantages of commissioning an archaeological evaluation in advance of construction works commencing.
- 1.55 However, following the granting of planning permission with reference to detailed construction plans, it was established that only driven piles used to support the buildings would extend to sufficient depth to potentially encounter archaeological material. Further consultation with Henneb determined that, evaluation trenching was impractical and that it was not possible to provide suitable mitigation in the form of a watching brief for piled foundations, and so the archaeological condition requiring a Written Scheme of Investigation (WSI) for a programme of archaeological mitigation was revoked (**Appendix EDP 3**).
- 1.56 It is anticipated that given the established general stratigraphic sequence of the Site's locality from the 2018 geotechnical SI set out in paragraphs 1.12-1.23 above (which identifies made ground of between c.3.3-4.6m in depth above alluvial deposits across the Site), the Site's established land use history as set out in **Section 4** of this report, as well as the nature, scale, massing, design and character of the Proposed Development, with the implementation of similar construction techniques, the same established principles for no archaeological investigation and/or mitigation requirements would also apply to the Site with regards to the Proposed Development.

Section 2

Legislation and Planning Guidance

INTRODUCTION

- 2.1 This section sets out relevant legislation and planning policy, governing the conservation and management of the historic environment.

LEGISLATION AND CASE LAW

- 2.2 The Historic Environment (Wales) Act 2023 came into force on 4 November 2024, in addition to a suite of regulations which are necessary to support it and now sets out the primary legislation for the historic environment for Wales.

Listed Buildings

- 2.3 The Historic Environment (Wales) Act 2023 (the 2023 Act) replicates the s16 statutory duty for Listed Building Consent (LBC) in the (English) *Planning (Listed Buildings and Conservation Areas) Act 1990*, but not the s66(1) statutory duty, where planning permission is concerned, and instead this is replicated in an amendment to the (UK) Town and Country Planning Act 1990.

- 2.4 Under *Part XV Miscellaneous and General Provisions*, (as an *Application of the Act in Special Cases*) at paragraph 314A (1) the following is stated, as an application of the Act that only applies in Wales:

Wales: duties relating to listed buildings and features of architectural or historic interest

(1) “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.”

- 2.5 In replicating the s66(1) statutory duty, the wording at paragraph 314A (1) has been extensively tested through case law, although this doesn't directly apply to the 2023 Act.

- 2.6 In this respect, the meaning of the ‘special regard’ duty has previously been tested in the court of appeal in terms of the *Planning (Listed Buildings and Conservation Areas) Act (1990)*.

- 2.7 This process confirmed that “considerable importance and weight” should be afforded by the decision maker to the desirability of preserving a listed building along with its setting. The relevant judgement is referenced as *Barnwell Manor Wind Energy Ltd v East Northants*

District Council, English Heritage and National Trust (2014) EWCA civ 137.

- 2.8 However, it must be recognised that section 66(1) of the 1990 Act did not identify that the local authority or the secretary of state *must* preserve a listed building or its setting; and neither did it indicate that a development which does not preserve them is unacceptable or should therefore be refused. The statutory duty in the Town and Country Planning Act clearly adopts the same approach insofar as development and the setting of listed buildings is concerned.
- 2.9 This point is made very clearly in paragraph 54 of the judgement regarding *Forest of Dean DC v Secretary of State for Communities and Local Government (2013)*, which identifies that:
- “...Section 66 (1) did not oblige the inspector to reject the proposal because he found it would cause some harm to the setting of the listed buildings. The duty is directed to ‘the desirability of preserving’ the setting of listed buildings. One sees there the basic purpose of the ‘special regard’ duty. It does not rule out acceptable change. It gives the decision-maker an extra task to perform, which is to judge whether the change proposed is acceptable. But it does not prescribe the outcome. It does not dictate the refusal of planning permission if the proposed development is found likely to alter or even to harm the setting of a listed building.”*
- 2.10 In other words, it is up to the decision maker (such as a local authority) to assess whether the proposal which is before them would result in “*acceptable change*” a concept that should be applicable regardless of which form of legislation is referred to.

Conservation Areas

- 2.11 Section 160(1) of the 2023 Act states 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*”.
- 2.12 In other words, the decision-maker’s statutory duty under the 2023 Act is to pay special attention to the desirability of preserving or enhancing the character or appearance of a Conservation Area.
- 2.13 As for listed buildings, the 2023 Act replicates the wording of the s72 duty of the (English) *Planning (Listed Buildings and Conservation Areas) Act (1990)*, upon which Section 160(1) of the 2023 Act is based.
- 2.14 Although it doesn’t directly apply to the 2023 Act, the 1990 Act has previously been tested through case law. It has been established by the Courts that development that does not detract from the character or appearance of a Conservation Area is deemed to be in accordance with the legislation. There is no statutory requirement to actively ‘enhance’.
- 2.15 The statutory duty, set out in Section 72 of the 1990 Act, does not extend to cover the ‘setting’ of a Conservation Area, which instead is a matter addressed through relevant planning policies.

- 2.16 Equally the wording of the 2023 Act does not include reference to the setting of conservation areas which is addressed by planning policies and has no statutory protection.

NATIONAL PLANNING POLICY

- 2.17 The Welsh Government published *Future Wales: The National Plan 2040* on 24 February 2021 (WG, 2021), which highlights in the foreword from the Minister for Housing and Local Government that it forms a “*framework for planning the change and development our country will need over the next two decades*”.
- 2.18 In terms of the Welsh Government’s objectives, the sixth ‘Future Wales Outcomes’ on page 55 states that:
- “Development plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists and providing a distinctive and trusted brand for Welsh businesses”.*
- 2.19 National planning guidance, concerning the treatment of the historic environment across Wales, is detailed in Section 6.1 of Chapter 6 Distinctive and Natural Places of Planning Policy Wales Edition Twelve, which was published on 07 February 2024 (PPW 12).
- 2.20 As it predates it, It is noteworthy that PPW 12 does not currently reference the *Historic Environment (Wales) Act 2023* instead referencing legislation that has been repealed. It is anticipated that a new edition of PPW will be issued that references the Act in due course.
- 2.21 However, Schedule 14 of the 2023 Act makes provision for the transition between the legislation that has been repealed and the new Act and its associated regulations. As such, the transitional provisions anticipate such situations, so that repealed provisions can be interpreted and implemented correctly under the new legislation.
- 2.22 At paragraph 6.1.2, it identifies the historic environment as comprising individual historic features, such as archaeological sites, historic buildings and historic parks, gardens, townscapes and landscapes, collectively known as ‘historic assets’.
- 2.23 At paragraph 6.1.6, the Welsh Government’s specific objectives for the historic environment are outlined. Of these, the following is/are of relevance to the current assessment:
- Conserve archaeological remains, 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; and
 - Preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous.

2.24 At paragraph 6.1.7, it is observed that:

"It is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way."

2.25 As such, with regard to decision making, it is stated (at paragraph 6.1.9) that: *"Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place"*.

Listed Buildings

2.26 Regarding listed buildings, PPW 12 states, at paragraph 6.1.10, that: *"There should be a general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage"*. It adds that *"For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement 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.."*

Conservation Areas

2.27 Paragraph 6.1.14 of PPW 12 states that: *"There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings"*.

2.28 Paragraph 6.1.15 then adds that:

"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."

2.29 This is picked up in paragraph 6.1.16, which advises that:

"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."

Archaeological Remains

2.30 Moving on to the treatment of archaeological remains through the planning process, PPW 12 states at paragraph 6.1.23 that: *"The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not"*.

2.31 It then adds at paragraph 6.1.24 that:

“Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance).”

2.32 At paragraph 6.1.25 it states that: *“In cases involving less significant archaeological remains, planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development”*.

2.33 Paragraph 6.1.26 recommends that:

“Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.”

2.34 In situations where planning approval would result in archaeological remains being destroyed by development, paragraph 6.1.27 of PPW 12 states the following regarding the relevant planning authority’s obligations:

“If the planning authority is minded to approve an application and where archaeological remains are affected by proposals that alter or destroy them, the planning authority must be satisfied that the developer has secured appropriate and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository. On occasions, unforeseen archaeological remains may still be discovered during the course of a development. A written scheme of investigation should consider how to react to such circumstances or it can be covered through an appropriate condition for a watching brief.

Where remains discovered are deemed to be of national importance, the Welsh Ministers have the power to schedule the site and in such circumstances scheduled monument consent must be required before works can continue.”

Technical Advice Note 24 (TAN24)

2.35 Additional heritage guidance in Wales is set out in *Technical Advice Note 24: The Historic Environment* (TAN 24) (Welsh Government, 2017).

2.36 Like PPW 12 TAN 24 predates the Historic Environment (Wales) Act 2023 instead referencing legislation that has been repealed. It is anticipated that a new edition of TAN 24 will be issued that references the Act in due course. As such, the transitional provisions in Section 14 of the Act allow for the repealed provisions to be interpreted and implemented correctly under the new legislation.

2.37 TAN 24 sets out that it provides “guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning applications.”

2.38 It clarifies the policies and distinctions made in PPW (2024). A definition for a ‘historic asset’ is given as:

“An identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.”

2.39 Effects through changes within the setting of a designated historic asset are covered in TAN 24 at paragraphs 1.23 to 1.29. These paragraphs define the setting of an historic asset as comprising:

“...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.”

2.40 TAN 24 also identifies factors to consider when assessing effects on the setting of historic assets. Paragraph 1.26 states 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.”

2.41 Paragraph 1.29 goes on to state that:

“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.”

2.42 Section 4 of TAN 24 is concerned with archaeological remains and is thus also relevant to the current assessment. Key points of advice, derived from the guidance, regarding archaeological remains and the development process, which are relevant to the current application, are as follows:

- *“The importance of pre-application discussion is stressed in order to reconcile the needs of archaeology and development between the applicant, the local planning authority, their archaeological advisors and, in cases where scheduled monuments may be affected, Cadw;*

- *Applicants are encouraged to make an enquiry with the body with responsibility for the relevant historic environment record and seek advice from the local planning authority's archaeological advisor at an early stage in considering their development proposal;*
- *Where archaeological remains are known to exist, or considered likely to exist, and a study has not already been undertaken by the applicant, the local planning authority should ask an applicant to undertake a desk-based archaeological assessment and, where appropriate, an archaeological evaluation. These should be done by a qualified and competent expert to the appropriate standard. The reports of these investigations will form part of the planning application. Applicants should show they have modified their development proposals to minimise any negative impact on the identified archaeological remains, and how they intend to mitigate any remaining negative impacts; and*
- *The case for the preservation of archaeological remains that are not considered to meet the criteria for national importance (see Annex A.2), must be assessed on the individual merits of each case. The local planning authority must take into account relevant policies and material considerations, and will need to weigh the significance of the remains against the benefits of and need for the proposed development."*

2.43 Regarding the preservation, recording and understanding of archaeological evidence, the guidance contains the following points of advice:

- *"Measures can be taken to minimise the impact of a development proposal on identified archaeological remains and allow their preservation in situ;*
- *Having considered all policies and other material considerations and the need for the development, the local planning authority may decide that the significance of the archaeological remains is not sufficient to justify their physical preservation. In these cases, the local planning authority must satisfy itself that the necessary and proportionate arrangements for the excavation and recording of these archaeological remains are secured, and the results of this archaeological work are properly analysed and published; and*
- *Any programme of archaeological excavation and recording should precede the start of work on the development, unless there are exceptional circumstances which prevent this from occurring."*

2.44 Regarding unexpected archaeological discoveries, the guidance states the following:

"Where unexpected archaeological discoveries are considered to be of national importance, the Welsh Ministers have the power to schedule the site (see Annex A). In the event of scheduling, the developer must seek separate scheduled monument consent before work can continue. It is also open to the local planning authority and the Welsh Ministers to revoke or modify a planning permission under these circumstances, in which case there is provision for the compensation of the developer for loss of value and expenditure incurred."

LOCAL PLANNING POLICY

NCC Local Development Plan (LDP)

- 2.45 The Site falls within the administrative planning authority of NCC. Local planning policy is set out in the 'Newport Local Development Plan 2011–2026' (adopted in January 2015) (NCC, 2015).
- 2.46 The LDP sets out a total of 10 objectives to support the sustainable development strategy and development plan set out in the document. Of relevance to the Site and the Proposed Development is Objective 5 – Conservation and Built Environment, which states the following:
- “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.”*
- 2.47 The LDP also sets out Strategic Policies (SP) throughout the Local Plan. Strategic Policy 9: Conservation of the Natural, Historic and Built Environment (SP9) is of relevance to the Site and the Proposed Development. Strategic Policy 9, states the following:
- “The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals.”*
- 2.48 As such, SP9 ensures that *“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”*.
- 2.49 Additionally, 'Cultural Environment' (CE) policies with regards to the historic environment are set out in 'Section 4: Environment' of the LDP. Relevant policies to the Site and Proposed Development are outlined below.
- 2.50 Policy CE5: Locally Listed Buildings and Sites, states the following:
- “Buildings and sites of local significance for their architectural or historic interest will be included on a local list and should be protected from demolition or inappropriate development”*.
- 2.51 Policy CE6: Archaeology, states the following:
- “Development proposals will normally be required to undertake an archaeological impact assessment before the proposal is determined:*
- i. where groundworks and/or the installation of services are proposed within the archaeologically sensitive areas of Caerleon, the levels, lower Machen and the city centre; or*
 - ii. within other areas of recognised archaeological interest.”*
- 2.52 Policy CE7: Conservation Areas, states the following:

“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. Avoid the removal of existing historic features, including traditional shopfronts and joinery.*
- 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 setting 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.”*

Newport Replacement Local Development Plan (RLDP)

- 2.53 A formal review process of the currently adopted LDP was initiated by NCC 14 October 2020. According to NCC, a public consultation on a ‘Deposit Plan’ (i.e. full draft LDP) is anticipated to be published between October to December 2024 (NCC, 2024a). As such, no draft RLDP was available for consultation at the time of the assessment.
- 2.54 Overall, legislation and planning policy outlined in **Section 2** have all been considered in this Assessment.

Section 3

Methodology

ARCHAEOLOGICAL ASSESSMENT METHODOLOGY

- 3.1 This assessment has been undertaken in accordance with the *Standard and Guidance for Historic Environment Desk-Based Assessment* issued by the Chartered Institute for Archaeologists (CIfA, 2020) as well as guidance documents outlined in paragraph 1.4 above. These guidelines provide a national standard for the completion of desk-based assessments.
- 3.2 The assessment principally involved consultation of readily available archaeological and historical information from documentary and cartographic sources. The major repositories of relevant information comprised:
- Cadw's national database for designated historic assets – for recorded designated historic assets within the Site and surrounding area;
 - Glamorgan-Gwent Archaeology (Heneb) Historic Environment Record (HER) March 2024 commercial dataset – for recorded non-designated historic assets as well as archaeological sites, monuments, findspots and previous archaeological events (investigation/mitigation) within the Site and surrounding area;
 - The National Monuments Record of Wales – for recorded non-designated historic assets as well as any other archaeological sites, monuments and/or findspots;
 - Historic maps and satellite imagery held by National Library of Scotland, EnviroCheck and Google Earth and other relevant sources – for the establishment of land use history within the Site and surrounding area;
 - Maps and documents held by Gwent Archives, where relevant – for the establishment of land use history within the Site and surrounding area; and
 - Aerial photographs which are held by the Central Register of Aerial Photography for Wales (CRAPW) at Cardiff – for identification of previously unrecorded earthworks, cropmarks and/or archaeological features within the Site.
- 3.3 The information gathered from the repositories and sources identified above was checked and augmented through the completion of two site walkovers undertaken in March and September 2024. The walkovers considered the nature and significance of known and/or potential archaeological assets within the Site, identified visible historic features and assessed possible factors that may affect the survival or condition of known or potential archaeological assets.
- 3.4 This report provides a synthesis of relevant information for the Site derived from a search area extending up to 500m from its boundary, hereafter known as the 'Study Area', to allow for additional contextual information on its archaeological interest or potential to be gathered and then understood.

- 3.5 Throughout the report, where referenced and relevant, designated historic assets are referenced by their Cadw reference number, non-designated historic assets and previous archaeological events are referenced by their Preferred Reference Number. The distribution of designated historic assets, non-designated historic assets and previous archaeological events are presented in **Plans EDP 1 to 3**.

ASSESSMENT OF SIGNIFICANCE

- 3.6 The assessment of significance of known/recorded archaeological remains within the Site makes reference (where relevant) to the four 'heritage values' identified by Cadw within its Conservation Principles document (Cadw 2011). These are:
- The asset's *evidential value*, which is defined as those elements of the historic asset that can provide evidence about past human activity, including its physical remains or historic fabric;
 - The asset's *historical value*, which is defined as those elements of an asset which might illustrate a particular aspect of past life or might be associated with a notable family, person, event or movement;
 - The asset's *aesthetic value*, which is defined as deriving from the way in which people draw sensory and intellectual stimulation from the historic asset; and
 - The asset's *communal value*, which is defined as deriving from the meanings that a historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory.

SETTING OF HISTORIC ASSETS

- 3.7 In addition to the potential for direct impacts on the fabric of an asset, when assessing the impact of proposals on historic assets, it is important to ascertain whether change within their 'setting' would lead to a loss of 'significance'. This assessment of potential indirect effects (in terms of 'setting') is made according to Cadw's guidance Setting of Historic Assets in Wales, which was published in May 2017.
- 3.8 In simple terms, the guidance states that setting "*includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape*". It must be recognised from the outset that 'setting' is not a historic asset and cannot itself be harmed. The guidance states that the importance of setting "*lies in what it contributes to the significance of a historic asset.*"
- 3.9 As such, when assessing the indirect impact of proposals on historic assets, it is not a question of whether their setting would be affected, but rather a question of whether change within the asset's 'setting' would lead to a loss of 'significance'.
- 3.10 Set within this context, where the objective is to determine the potential for development to have an indirect effect on historic assets beyond the boundary of a development site, it is necessary to first define the significance of the asset in question – and the contribution

made to that significance by its 'setting', in order to establish whether there would be a loss, and therefore harm.

- 3.11 The guidance identifies that change within a historic asset's setting need not necessarily cause 'harm' and that it can be positive or in fact neutral.
- 3.12 Cadw's guidance (Cadw, 2017b) sets out a four-stage approach to the identification and assessment of setting effects; i.e.:
- **Stage 1:** Identify the historic assets which might be affected;
 - **Stage 2:** Define and analyse the setting, to understand how it contributes to the asset's heritage significance;
 - **Stage 3:** Evaluate the potential impact of development; and
 - **Stage 4:** Consider options to mitigate or improve that potential impact.
- 3.13 Therefore, the key issue to be determined is whether, and to what extent, the Proposed Development would affect the contribution that setting makes to the heritage significance of the asset under consideration, as per **Stage 2** of the Cadw guidance.

Scoping Methodology – Defining the 'Study Area'

- 3.14 A staged approach has been utilised to appropriately determine which designated historic assets within the surrounding landscape have the potential for their settings to be affected by the Proposed Development, to fulfil **Stage 1** of the Cadw setting assessment guidance.
- 3.15 A Zone of Theoretical Visibility (ZTV) analysis, verified through map analysis was initially applied to the Site. This was undertaken to provide an indication of the potential intervisibility between the built form of the Proposed Development and surrounding landscape. The ZTV projection utilised the following parameters:
- Basemap: 1m Digital Surface Model (DSM);
 - Range: 3km;
 - Development height: uniform building height of 15.15m above ground level for footprint of Proposed Development's five-storey flat block; and
 - Target/observer height: 1.6m
- 3.16 The ZTV is based on a Digital Surface Model (DSM), which captures not only the topography of the landscape, but the natural and built features on the earth's surface. However, the accuracy of the DSM to which obstructions to lines of sight between two points are recorded, is dependent on the resolution of the DSM utilised in the ZTV model.
- 3.17 Limitations to the utilisation of a ZTV alone derive from its creation from a fixed point (or points) in time and space, which is relative to the resolution of the LiDAR data used alongside it. Therefore, a ZTV will not account for the dynamic nature of a given landscape

in its entirety, nor does it account for all landscape features or atmospheric factors that affect visibility. Hence, it should be considered that an absolute worst-case scenario for intervisibility between historic assets and the Proposed Development is represented by the ZTV and considered for this assessment.

- 3.18 The ZTV provides a preliminary succinct yes/no overview of which parts in the surrounding landscape could share intervisibility with the Proposed Development and was overlaid with designated historic assets supplied by Cadw's Cof Cymru database, within a 3km radius from the Site. Those designated historic assets shown to fall within the extent of the ZTV have theoretical visibility of the Site in its developed form.
- 3.19 A review of the ZTV model, map analysis and observations made from both site walkovers, determined that the intervisibility between the Proposed Development and surrounding designated historic assets would be predominantly obstructed by the intervening built form of Newport's urban townscape. Any experience of surrounding assets, where afforded, would be limited to distant views of the rooftops and/or upper peripheral elements of surrounding assets from the rooftop and/or upper parts of the Proposed Development.
- 3.20 Furthermore, surrounding assets are located within their respective street scene settings, in which they are best experienced, and their heritage significance understood and appreciated. The Site does not form a part of the surroundings in which they are experienced within their respective street scene settings. This would apply to most assets located within a 3km radius of the Site.
- 3.21 Hence, at this stage assets beyond 500m from the Site boundary are not considered to be sensitive to change and therefore are not considered any further in this report. The exception to this is the Grade I Transporter Bridge including E and W anchor chambers (**3076**), located 1.4km south of the Site, which would be experienced from the Site on account of its height and prominence. As such, a 500m radius study area was deemed appropriate for assessing whether the Proposed Development within the Site would have the potential to affect the settings of surrounding designated historic assets.

Section 4 Baseline Information

INTRODUCTION

- 4.1 This section of the assessment identifies the 'designated' and 'non-designated' historic assets that are considered may be affected by the Proposed Development.
- 4.2 The Site does not contain any designated historic assets such as world heritage sites, scheduled monuments, listed buildings, conservation areas, or registered historic parks and gardens. The designated historic assets in the wider area have been assessed to identify those that have the potential to experience change to their setting, such that could result in harm their significance. The locations of designated historic assets considered below are shown on **Plan EDP 1**.
- 4.3 With regards to non-designated historic assets, there are 54 HER records comprising locally listed buildings (i.e. 'historic assets of special local importance'), archaeological and historical sites, artefact findspots and other historic buildings of local interest as recorded on the Henneb HER within a 500m radius of the Site (**Plan EDP 2**). In addition, there are records of 15 events in the form of desk-based assessments, archaeological watching briefs, historic building recording and field visit observations within a 500m radius (**Plan EDP 3**). Those records and events considered relevant to this assessment are discussed below, therefore not all the returned records are included with the text or on the accompanying plans.

DESIGNATED HISTORIC ASSETS

Setting Assessment Stage 1 – Identify the Historic Assets that Might be Affected

- 4.4 The following addresses **Stage 1** of the four-stage approach to setting assessment described in the Cadw guidance (Cadw, 2017b). For the purposes of the report at this stage, this will identify those assets to be assessed, with an assessment of setting and contribution to the significance of relevant assets (i.e. **Stage 2**) and an impact assessment (i.e. **Stage 3**) completed within **Section 5** of this report in relation to the Proposed Development as relevant.
- 4.5 There are no designated historic assets located within the Site, however, within a 500m radius of the Site boundary there is one Grade II* listed building, nine Grade II listed buildings and one conservation area. According to Cadw's Cof Cymru database, these assets comprise the following:
- Grade II* listed 1964 built George Street Bridge (**25847**), located adjacent to the north-west of the Site;
 - Grade II listed early 19th century 69 Lower Dock Street (**3029**), located c.480m west of the Site;

- Grade II listed 19th century 124 and 124a [Lower Dock Street] (**21289**), located c.490m south-west of the Site;
 - Grade II listed c.1900 built 120 Lower Dock Street (**21288**), located c.480m south-west of the Site;
 - Grade II listed 19th century Old Custom House (Celtic Displays) (**21291**), located c.460m south-west of the Site;
 - Grade II listed 19th century Liscombe Manufacturing (**21292**), located c.450m south-west of the Site;
 - Grade II listed early 19th century 77 Lower Dock Street (**3030**), located c.450m south-west of the Site;
 - Grade II listed early 19th century 78 Lower Dock Street (**23145**), located c.460m south-west of the Site;
 - Grade II listed mid-19th century 109 Lower Dock Street (Masonic Hall) (**3028**), located c.440m south-west of the Site;
 - Grade II listed mid-late 19th century 108 Lower Dock Street (**18180**), located c.440m south-west of the Site; and
 - Lower Dock Street Conservation Area, located c.400m south-west of the Site.
- 4.6 Due to the scale of the Proposed Development and its proximity to the Grade II* listed George Street Bridge (**25847**), this asset is taken forward to **Stage 2** and **Stage 3** within **Section 5**.
- 4.7 With regards to the remaining designated historic assets located within 500m of the Site boundary, these assets comprise of the Lower Dock Conservation Area and nine of ten Grade II listed buildings located therein. All assets are located to the west/south-west of the Site, beyond the west bank of the River Usk.
- 4.8 The Grade I Transporter Bridge including E and W anchor chambers (**3076**), although located c.1.4km south of the Site, has been identified to be visible from the upper parts of the Proposed Development. A concern for the potential for the Proposed Development to affect a view from the Grade II* listed George Street Bridge (**25847**) towards the Grade I Transporter Bridge including E and W anchor chambers (**3076**) has been raised by the HBCO (**Appendix EDP 2**). As such, the designated historic asset is scoped into **Stage 2** and **Stage 3** of the setting assessment undertaken in **Section 5** of this report to address such concern.
- Lower Dock Conservation Area and listed buildings contained within**
- 4.9 The Lower Dock Conservation Area is located c.400m south-west of the Site, beyond the River Usk and development lining either side of Usk Way. The conservation area was designated by NCC in April 1995 and extended in December 1999 (NCC, 2024b). No conservation area appraisal has been produced for the Lower Dock Conservation Area.

- 4.10 The special character and appearance of the conservation area is defined by various 19th century two-three storey residential and commercial properties lining the north-west to south-east orientated Lower Dock Street. The area reflects the history of its 19th century development as a result of incoming trade and industry from the arrival of the canal and railway services, as well as the opening of Newport Dock in 1842 (NCC, 2024b).
- 4.11 The special architectural or historic interest of the conservation area is best illustrated by the historic fabric of its ten Grade II listed buildings, of which nine fall within the Study Area. These building comprise of two three-storey 19th century residential buildings and commercial buildings (i.e. shops, offices, Masonic Hall and Customs House). The architectural design of the listed buildings is stated to reflect the high-status of the occupants during the 19th century along Lower Dock Street, according to NCC's overview of the conservation area.
- 4.12 Additionally, locally listed buildings contained within the conservation area also contribute to the illustration of the area's special architectural or historic interest through the fabric and architectural design of additional two-three storey 18th-19th century buildings, historically utilised for various commercial and/or recreational uses. Locally listed buildings are addressed separately below under 'non-designated historic assets'.
- 4.13 With regards to the ten listed buildings located within the conservation area, their heritage significance is primarily bound in the special architectural interest of their built form and fabric, as well as the historic interest they have in their role in the 19th century development of Lower Dock Street.
- 4.14 The setting of the conservation area and the ten listed buildings contained within it, comprises Newport's urban centre, which features street scenes of surrounding commercial and residential properties of a similar scale, massing and heights to that along Lower Dock Street.
- 4.15 Observations made from consulted maps and the two site walkovers identified that the Site does not form part of the surroundings in which the conservation area or listed buildings are experienced, nor is the Site and any of these assets able to be experienced in combination with each other from within the surrounding urban landscape. This is due to the intervening built form along Usk Way and the George Street Bridge itself.
- 4.16 As such, the Site does not form part of the setting of the Lower Dock Conservation nor any assets contained within, nor does the Site make any contribution to the character and appearance of the conservation area. Development within the Site would have no potential to adversely affect any aspect of the setting of these assets, nor have the potential to impact any of the assets' heritage significance. The assets are not considered to be sensitive to change and therefore are not considered any further in this report.

NON-DESIGNATED HISTORIC ASSETS

Locally Listed Buildings

- 4.17 NCC maintains a 'Local List' for locally listed buildings (i.e. 'historic assets of special local importance' as defined in paragraph 6.1.29 of PPW 12), contained within the boundary of its administrative authority. The Local List was created following the publication of NCC's June 2013 *Local List Background Paper and Register* document for the currently adopted Newport LDP 2011-2026 (NCC, 2013).
- 4.18 As stated by PPW 12 in paragraph 6.1.29, historic assets of special local importance are defined as the following:
- "Planning authorities may develop lists of historic assets of special local interest, that do not have statutory protection, but that make an important contribution to local distinctiveness and have the potential to contribute to public knowledge. Where a planning authority chooses to identify historic assets of special local interest, policies for the conservation and enhancement of those assets must be included in the development plan."*
- 4.19 PPW 12's requirement above is enforced via 'Policy CE5: Locally Listed Buildings and Sites' in the Newport LDP, outlined in paragraph 2.32, above.
- 4.20 According to the June 2013 NCC document, the Local List contains "144 entries, spanning a wide range of buildings and structures including houses, shops, barns, offices, industrial buildings, chapels, gates, walls, road signs, WWII pillboxes, graves and stiles" (NCC, 2013:7). The approximate location of all entries included on the Local List are recorded on the HER only, with groups of entries recorded together at single points for multiple buildings located along the same street.
- 4.21 As stated by NCC's June 2013 document, the heritage significance of locally listed buildings included on the list, is predominantly derived from their respective architectural and/or historic interest, reflected in their post-medieval vernacular architectural styles and/or contemporary high quality architectural designs.
- 4.22 No locally listed buildings are recorded within the Site, however, according to Appendix 2 of the June 2013 NCC document and the March 2024 HER dataset, a total of 15 locally listed buildings are recorded within the Study Area. These are all located along Lower Dock Street, within the limits of the Lower Dock Street Conservation Area (i.e. **GGAT05100g, GGAT05075g, GGAT05167g, GGAT05168g, GGAT05169g, GGAT05170g, GGAT05171g, GGAT05164g, GGAT05165g, GGAT05166g, GGAT05159g, GGAT05160g, GGAY05161g, GGAT05162g, GGAT05163g**) located from c.380m south-west of the Site. According to the HER, these assets comprise 18th-19th century stone and/or brick built, two-three storey buildings, historically utilised for various purposes (e.g. warehouses, offices, halls, shops, hotels, public houses, houses). Their heritage significance, as outlined above, is predominantly derived from their local architectural and historic interest held within their fabric, reflecting high quality architectural design of the 18th-19th century along Lower Dock Street, Newport.

- 4.23 The setting of the locally listed building contained within the Study Area reflects that of surrounding listed buildings along Lower Dock Street and that of the Lower Dock Street Conservation Area. In that their settings comprise Newport's urban centre, which features street scenes of surrounding commercial and residential properties of a similar scale, massing and heights to that along Lower Dock Street.
- 4.24 As stated in paragraph 4.15-4.16 above, observations made from consulted maps and the two site walkovers identified that the Site does not form part of the surroundings in which the conservation area or listed buildings to Lower Dock Street are experienced, nor is the Site and any of these assets able to be experienced in combination with each other from within the surrounding urban landscape. This applies to the locally listed buildings along Lower Dock Street, which lie within the conservation area and are located adjacent to surrounding listed buildings. The absence of any experience is due to the intervening built form along Usk Way and the George Street Bridge itself.
- 4.25 As such, the Site does not form part of the setting of locally listed buildings situated along Lower Dock Street within the Study Area. Development within the Site would have no potential to adversely affect any aspect of the setting of these assets, nor have the potential to impact any of the assets' heritage significance. These assets are not considered to be sensitive to change and therefore are not considered any further in this report.

Archaeological Remains

HER Chronological Overview

- 4.26 A chronological overview of HER records within the Site and Study Area is provided below. The locations of HER records are shown on **Plan EDP 2** for reference. Recorded previous archaeological investigation and/or mitigation events on the HER, which are of relevance to the Site's archaeological potential are discussed below, where relevant. The locations of previous events are shown on **Plan EDP 3**. As stated above, those records and events considered relevant to this assessment are discussed below, therefore not all the returned records are included with the text or on the accompanying plans.

Pre-Industrial (c.500,000BC – AD 1750)

- 4.27 There are no HER records attributed to the prehistoric, Roman, early medieval or medieval period within the Site or Study Area.
- 4.28 There are no previous events recorded within the Site. Within the Study Area, no evidence for archaeological remains pre-dating the 18th century industrial period of Newport have been recorded by previous events included on the HER. The exception to this are timber remains for a single possible medieval vessel or wooden waterfront structure recorded during a 2006 watching brief by Glamorgan-Gwent Archaeological Trust (**GGATE005741**), located c.270m south-west of the Site (Dunning, 2006).
- 4.29 Overall, based on HER data alone, the absence of any dated remains for the prehistoric through to medieval period within the Site and Study Area on the HER and from previous events, indicates a very low potential for such remains within the Site.

Industrial (AD 1750 - Present)

- 4.30 There are no HER records for post-medieval remains within the Site. Within the Study Area there are 49 HER records present. These records include the fifteen identified 18th-19th century locally listed buildings within the Study Area, which have been discussed above and are not discussed in any further below.
- 4.31 Four records on the HER are attributed to the location of former jetties along the east and west banks of the River Usk, located within the area of Spyty Pill. According to the HER, the jetties were utilised for the offloading of ballast stone during the 18th-19th centuries, based on their attributed dates from historic mapping evidence. Hence, such jetties are associated with industrial activity in Newport during the late post-medieval period. The location of former jetties are situated c.470m south-east of the Site (**GGAT05081g**), c.130m south of the Site (**GGAT05082g**) and c.290m north-west of the Site (**GGAT05106g**) along the east bank of the River Usk, as well as c.230m south-west of the Site (**GGAT05083g**) along the west bank of the River Usk. An additional possible jetty location is also recorded on the HER along Corporation Road (**GGAT05080g**), located c.220m north of the Site. No extant remains associated with these HER records are noted on the HER, nor were any identified during the site walkovers.
- 4.32 Two associated HER records to the recorded locations of former jetties comprise a ballast stone and sand bank (i.e. storage area) (**GGAT15312g**) located c.200m north-west of the Site, and a salt pond (**GGAT05109g**) located c.290m north-west of the Site. The HER notes that these industrial landscape features were removed and/or built over by the early 20th century.
- 4.33 One HER record comprises recorded timber remains associated with a 19th century coal staithe or timber coal wharf (**GGAT05113g**), located c.70m north-west of the Site. The timber remains are situated in the mud along the east bank of the River Usk, beyond the north side of the 1964 built Grade II* listed George Street Bridge (**25847**).
- 4.34 The HER contains records for various 18th-19th century pills along the west and east banks of the River Usk. Pills provided landing places and shelter for boats along the River Usk.
- 4.35 The closest pill recorded on the HER is located c.20m south-west of the Site, called 'Rodney Parade Pill' (**GGAT15314g**). Consultation of historic maps, however, indicate that the actual location of the former pill was most likely to the south of the Site. This is indicated by a 1752 estate map of lands belonging to the Early of Powys in Monmouth county, surveyed by Thomas Thorpe, as well as a more convincingly on the later 1836 map of Newport by John Wood and the 1840 Christchurch Parish Tithe Map, discussed below. The pill is shown to have been removed/infilled by the later 19th century. No trace of the pill survives within or adjacent to the Site.
- 4.36 Within the Study Area, the location of two other pills are recorded. These pills comprise the extant 19th century 'Jacks Pill' (**GGAT05063g**) located c.240m south of the Site, as well as the location of an unnamed mid-18th to early-19th century pill (**GGAT05089g**) located c.500m north-west of the Site.

- 4.37 The HER contains records associated with the former 19th century wharves of Newport Dock, along the west bank of the River Usk. A general record for the remains of wharves along the river's mud bank is recorded (**GGAT03708g**), as well as HER records for uncovered remains of specific wharves from previous events. These records comprise the timber remains associated with Victoria Wharf (**GGAT11540g**) located c.200m south of the Site, as well as the recorded structural foundations (**GGAT09020g**), mooring post (**GGAT09022g**) and other remains (**GGAT09021g**) recorded for Ebbw Vale Wharf during a watching brief in 2008 (**GGATE000018**) located between c.420-500m north-west of the Site (Sell, 2008).
- 4.38 One HER record is associated with a possible steam outfall within a former pill (**GGAT05084g**). According to the HER, this industrial feature is located c.130m south of the Site along the east bank of the River Usk.
- 4.39 Remaining post-medieval HER records within the Study Area, associated with other Newport Dock industrial 19th century remains comprise: a slipway south of Jack's Pill (**GGAT111389g**), located c.250m south of the Site; an early 19th century dry dock complex (**GGAT05066g**, **GGAT005074g**) located c.340m south of the Site; and three former brick and/or stone built structures north of Jack's Pill (**GGAT11139g**, **GGAT11140g**, **GGAT11141g**), located between c.210-250m south-west of the Site. The dry dock now features modern flat block developments (e.g. Selskar Court – River Front), while the three structures north of Jack's Pill have been demolished, prior to the construction of the Newport Student Village flat block and adjacent car park.
- 4.40 Three HER records comprise recorded remains of the former mid-19th century 'Western Valleys Railway Station' or 'Dock Street Station', located on the west side of the River Usk c.340-370m south-west of the Site. Remains were recorded during a 2006 watching brief (**GGATE005853**), which recorded buried remains (**GGAT05076g**), which included a turning platform (**GGAT11578g**) (Bradburn, 2006).
- 4.41 Of the remaining eight HER records attributed to the post-medieval period. These comprise 19th century two three-storey historic buildings along Lower Dock Street (**GGAT03706g**, **GGAT05096g**, **GGAT05175g**, **GGAT05176g**, **GGAT05178g**, **GGAT05097g**, **GGAT05156g**, **GGAT05158g**), located from c.470m south-west of the Site.
- 4.42 Of the eight recorded archaeological watching briefs within the Study Area, such events recorded 18th-19th century remains along the west side of the River Usk, within Newport Dock. Recorded remains not noted on the HER, include remains associated with the Monmouthshire Railway and Canals Company (**GGATE004717**), a former crane platform and access chamber (**GGATE006383**), dry docks walls south of Jacks Pill (**GGATE006214**), timber remains associated with vessels or waterfront structures (**GGATE005741**).
- 4.43 With regards to modern HER records, no such records are located within the Site. Within the Study Area, five modern HER records are present.
- 4.44 Two HER records are associated with former early 20th century WWI factories, comprising a wirework (**GGAT10682g**) located c.100m south-east of the Site and a chemical works (**GGAT10715g**) located c.470m south-east of the Site. The area in which these two factories were located within now comprises a modern housing estate along Argosy Way.

- 4.45 One HER record is for the timber remains within the mud of the River Usk's east bank, associated with mid-late 20th century wharf (**GGAT15310g**). The remains of the wharf are located c.250m north-west of the Site.
- 4.46 The remaining two HER records comprise a misprovenanced record for a mid-19th century drill hall located to the south of Lower Dock Street (**GGAT10666g**), as well as the location of a now destroyed early 20th century building (i.e. 22 Granville Square) (**GGAT10673g**). The drill hall is recorded to be c.490m north-west of the Site on the HER, while the former 22 Granville Square is recorded to be c.350m south-west of the Site.
- 4.47 Overall, recorded post-medieval and modern remains on the HER predominantly comprise evidence for 18th-20th century industrial maritime trade as well as industrial factories along the River Usk within Newport. Such remains comprise the infrastructure for the loading and offloading of ships, the landing and sheltering of ships, storage areas for construction materials, warehouses, factories, dockyards and transport infrastructure (i.e. Western Valleys Railway Station' or 'Dock Street Station'). In addition, the HER also contains records within the Study Area associated with historic buildings of local interest, associated with 19th century dwellings and/or commercial properties along Lower Dock Street.
- 4.48 The majority of HER records are located on the west bank of the River Usk within the former Newport Dock area, and/or are located at a distance from the Site along the river's east bank. Hence, the Site does not have the potential to feature remains associated with these records. Furthermore, the Site is unlikely to feature remains and/or deposits associated with the former 18th-19th century pill recorded adjacent to the Site (i.e. **GGAT15314g**). Consulted historic maps indicate that the true provenance of the historic landscape feature, was situated to the south of the Site, beyond its border.

PREVIOUS EVENTS

- 4.49 No previous archaeological events are recorded within the Site. With regards to the Study Area, a total of 15 previous archaeological events are recorded on the HER. These previous events comprise four desk-based assessments (**GGATE002268**, **GGATE005124**, **GGATE005138**, **GGATE005500**), two historic building recording surveys (**GGATE001346**, **GGATE001352**), one field visit (**GGATE005139**) and eight archaeological watching briefs (**GGATE004717**, **GGATE005553**, **GGATE005741**, **GGATE005839**, **GGATE005853**, **GGATE006214**, **GGATE006383**, **GGATE003133**). These events and their findings have been discussed above, where relevant

CARTOGRAPHIC SOURCES

Historic Maps

- 4.50 Historic maps have been used to aid the establishment of the Site's late post-medieval history (1836) onwards and identify land use change over time. Consulted historic maps include a Newport town map, Christchurch Parish Tithe Map and Ordnance Survey (OS) maps only. The historic maps which highlight key changes to land use within the Site are

outlined below and presented in **Plan EDP 4**. For reference, the publication date of each historic map is referred to below.

1836 John Wood Map of Newport (Llyfrgell Genedlaethol Cymru – The National Library of Wales)

- 4.51 The earliest consulted map comprises John Wood's map of Newport. The Site is shown to comprise open land at this time, with a former pill located within the Site's vicinity to the south.

1840 Christchurch Parish Tithe Map (The Genealogist.com)

- 4.52 The consulted 1840 Tithe Map of Christchurch Parish shows the Site to comprise part of a parcel of pasture along the east bank of the River Usk (plot 802a). No structures or industrial activity is shown within or immediately adjacent to the Site at this time. The former pill is shown to be located in proximity to the south of the Site. The associated tithe award shows that the name given to the pastoral field includes 'ballast', which may relate to a nearby ballast bank depicted on the later 1st Edition OS map.
- 4.53 The Site's depiction on the 1840 Tithe Map suggests that, prior to the mid-late 19th century, the Site was undeveloped, consisting of a strip of wetland close to the east bank of the River Usk. It is likely that the riverbanks in general would have been utilised for some sort of riverside activity such as fishing, or access for boats.

1883-1884 OS Map (EnviroCheck)

- 4.54 The 1st Edition 1883-1884 OS map shows the Site to comprise structures located within its centre and southern end. An enclosure also appears to lie adjacent to the Site to the south-east, connected to the southern structures within the Site. Additionally, the northern half of the Site features an earthen bank, potentially utilised as a ballast bank. A former jetty or slipway is shown in proximity to the south of the Site, likely associated with the structures and storage area within the Site. The Site is suggested to have functioned as a coal storage depot at this time. Hence, a change in land use from agricultural pastoral practices to industrial practices is shown to have occurred between 1840 to 1883-1884 within the Site.

1901-1902 OS Map (EnviroCheck)

- 4.55 The 2nd Edition 1901-1902 OS map shows that the former structures and ballast bank had been removed within the Site by the turn of the 20th century. The land within the Site is shown to have been reorganised to comprise an elongated rectangular structure along its far northern edge with a railway siding running parallel to the building and out of the north-east corner of the Site. Two smaller structures between the building and railway siding are also shown. The Site likely functioned as an industrial storage area at this time, linked to the East Usk Branch Railway and part of the wider infrastructure for the loading of ships along the east bank of the River Usk, such as an adjacent enclosed storage area to the north-west of the Site, also likely used for coal storage.
- 4.56 Coverack Road adjacent to the east/north-east of the Site is shown for the first time on the 1901-1902 OS map, laid out alongside Cyril Street and Morris Street as part of early 20th century terraced residential streets built across former fields.

1920-1921 OS Map (EnviroCheck)

- 4.57 The 3rd Edition 1920-1921 OS map shows minimal change to land use within the Site. The exception to this is the relocation of the two small structures within the Site to the Site's eastern end. The OS map marks these structures as 'W.M'. Based on the land use of the Site, these two structures may represent 'Weighing Machines'. This would reflect the Site's industrial storage use at this time.
- 4.58 Additional terraced residential housing is also shown to have been constructed by this time, including additional housing along Coverack Road, Moris Street and Cyril Street, as well as the laying out and construction along Witham Street, Feering Street and Kelvedon Street. Furthermore, the former Imperial Mills wireworks opposite Coverack Road to the south-east of the Site is also shown, reflecting the increasingly built up urban environment of the Site over the course of the early 20th century.

1937 OS Map (EnviroCheck)

- 4.59 The consulted 1937 OS map shows that the layout of the Site had been reorganised by this time. The elongated rectangular structure had been demolished and replaced with smaller structures within the north-west, north-east and south-west corners of the Site. The two 'Weighing Machines' as well as the railway siding within the Site is still shown to be present.
- 4.60 To the north-east of the Site, remaining open areas along Coverack Road are shown to have been infilled with residential terraces in proximity to the Site.

1955-1957 OS Map (EnviroCheck)

- 4.61 The consulted 1955-1957 OS map shows that the Site's layout had undergone another phase of reorganisation by this time, changing its use from an industrial storage area to the 'Uskside Paint Mills'. Additional buildings are shown to have been constructed within the north-east, centre and along the western edge of the Site. The Site is shown to have retained the railway siding and 'Weighing Machine' as part of the Site's reorganisation and change in land use.

1969-1971 OS Map (EnviroCheck)

- 4.62 The consulted 1969-1971 OS map shows that the Site had undergone a phase of demolition and reorganisation between the 1950s-1960s. Buildings within the north-west and south-west corners of the Site had been demolished as well as the railway siding within the Site removed by this time. Only three structures are shown within the Site, located along the Site's southern edge, south-east corner and north-east corner.
- 4.63 The cause for the removal of structures within the western half of the Site is likely associated with the construction of the 1964 built Grade II* listed George Street Bridge (**25847**). Being situated immediately adjacent to the bridge's structure.
- 4.64 The construction of the bridge itself is shown to have removed the whole length of terraced housing running along the east side of Moris Street. Hence, the bridge is shown to run parallel to the surrounding Cyril Street, Moris Street and Coverack Road likely as a result of seeking to minimise demolition and disruption to existing housing in the area to a single row of early 20th century terraces.

Late 20th and early 21st century Maps

- 4.65 Subsequent consulted maps show no change in land use within the Site until the demolition of remaining buildings associated with the 'Uskside Paint Mills' c.2009, when the Site is shown to comprise vacant land from then onwards.

Summary

- 4.66 Consulted historic maps indicate that prior to the late 19th century, the Site was utilised as pastoral land, situated on wetland along the east bank of the River Usk. From the late 19th century, the Site has been subject to industrial practices, having undergone successive phases of development through the construction, demolition and reorganisation of the Site's layout during its use as an industrial storage area and later 'Uskside Paint Mills'. The Site was utilised as an industrial storage area between the late 19th century to c.1950s, prior to its use as the site for the 'Uskside Paint Mills' until c.2009.
- 4.67 The construction of the Grade II* listed George Street Bridge (**25847**) in 1964, resulted in the demolition of the buildings across the western half of the Site, likely due to their proximity to the bridge itself. Meanwhile, the remaining structures within the Site, associated with the former paints mill were removed c.2009. Since 2009, the Site has remained as vacant, disused land.
- 4.68 Furthermore, consulted historic maps show the contemporary stark change in landscape character of the surrounding area over the course of the late 19th to early-mid 20th century with the rapid development of industrial areas along the east bank of the River Usk and residential areas constructed across farmland to the rear.

Aerial Photographs

- 4.69 Available aerial photographs dated between 1940-2000 (held by CRAPW) and Google Earth satellite imagery between 2001-2023 were consulted to further inform the Site's history over the 20th century and early 21st century, to elaborate, where possible, on the Site's development sequence outlined above using historic maps.
- 4.70 Consulted aerial photographs conform to the findings made from consulted historic maps. The Site comprised various structures from the mid-20th century to early 21st century (until c.2009), which were subject to demolition, construction and reorganisation of the Site's layout during its use by 'Uskside Paint Mills'.
- 4.71 The construction of the George Street Bridge and the demolition of buildings within the western half of the Site and along the east side of Moris Street, is shown on an aerial photograph dated 3rd October 1962. Subsequent aerial photographs show the Site continued to feature buildings across its eastern half throughout the latter half of the 20th century. The Site is even shown to feature a shed within the north-west corner of the Site from 1984 until its demolition with the remainder of the Site c.2009.
- 4.72 Consulted Google Earth satellite imagery conforms to the findings made from consulted historic maps. The Site comprised structures (e.g. warehouse sheds) within the north-west, north-east and southern parts of the Site with an open centre over the course of the 2000s. The buildings were associated with the former paints mill, which were subsequently

demolished c.2009. The Site is shown to have comprised vacant land with increasingly overgrown vegetation until between c.2020-2023, when the Site was utilised as a temporary construction compound for Coverack Road – Phase 1. The Site returned to vacant and disused land in 2023, which now features overgrown vegetation along its boundaries once more.

SITE WALKOVER OBSERVATIONS

- 4.73 Two site walkovers of the Site and surrounding area have been undertaken in support of this Archaeological and Heritage Assessment, undertaken in March 2024 and September 2024, respectively.
- 4.74 Overcast weather conditions were consistent throughout both walkovers, however, sufficient visibility persisted throughout the survey to allow an effective on-site assessment of Site ground conditions. In addition, the surrounding built historic assets were visited to establish the relationship between Site and historic asset for those considered in this report and discussed above and below.
- 4.75 The site walkover confirmed the ground conditions of the Site to comprise open hardstanding area, featuring waste and overgrown spoil mounds. The Site is bound on all sides by a metal fence (**Image EDP A1.1**).
- 4.76 Overall, no archaeological remains or evidence of earthworks of potential archaeological interest or significance were identified during either site walkover.
- 4.77 Observations made with regards to the setting of historic assets discussed in this report are included above and below, where relevant.

ARCHAEOLOGY POTENTIAL SUMMARY

- 4.78 Based on current evidence, the Site most likely comprised of a wetland area along the eastern bank of the River Usk, subject to frequent inundation overtime and limited to pastoral agricultural land uses, prior to the Site's industrial development from the late 19th century onwards. It is likely that the ground was subsequently built up over the course of the 20th century through its successive phases of development, through the construction, demolition and relocation of buildings across the Site.
- 4.79 The previous 2008 GI within the Site recorded, made ground deposits to range between c.3.3-4.6m below ground level and directly overlie alluvial deposits. As such, the successive redevelopment and reorganisation of the Site during its industrial use has resulted in the partial truncation and/or disturbance of underlying alluvial deposits to some degree.
- 4.80 The 2008 GI report also suggests that there are c.12.5m of alluvial clays, overlying fluvial sands and gravels that may represent a sequence of deposition dating back to the Mesolithic period, below existing made ground deposits. Although it is unlikely that there is any significant prehistoric archaeology remaining within the Site, considering the likely prehistoric inundation of the area, any remains would be located below made ground deposits within the Site, possibly at a far greater depth.

- 4.81 The HER and consulted previous events record no archaeological remains firmly dated to the prehistoric, Roman, early medieval, medieval periods within the Site or Study Area. Based on the absence of any previously recorded remains from these periods and the depth of alluvial deposits within the Site, which have the potential to contain earlier prehistoric remains, the Site is considered to have a very low potential for remains to date from these periods.
- 4.82 With regards to the post-medieval and modern periods historic mapping evidence suggests that archaeological remains most likely to be present within the Site would relate either to structures associated with the late 19th century industrial coal storage depot within the Site or structures associated with the subsequent mid-20th century to early 21st century 'Uskside Paint Mills' site. Hence, the Site has a high potential for late post-medieval and modern archaeological remains.
- 4.83 Remains relating to the former industrial buildings of the late 19th century, most of which are likely to have been removed during their demolition, will be located within made ground deposits within the Site. Remains of these buildings would be likely at best to consist of floor surfaces and possibly the remains of walls, masked by demolition rubble and later activity related to the 'Uskside Paint Mills'. Overlain by later development, such remains are unlikely to be well-preserved and would be of negligible historic interest or heritage significance.
- 4.84 Similarly, remains associated with the mid-20th century onwards 'Uskside Paint Mills' will comprise only buried structural remains, due to the Site's above ground clearance c.2009. Such remains, if present, are likely to comprise floor surfaces, foundations and wall bases. Such 20th century building remains would be of no historic interest or heritage significance.

Section 5 Impact Assessment

- 5.1 This section of the report provides a staged assessment of the likely impact of the Site's residential redevelopment on the significance of those designated historic assets that might be capable of being harmed as a result of change to their setting.
- 5.2 It therefore builds on the details set out in **Section 4** of this report and takes forward the rest of the staged approach which is described in Cadw (2017b) for the identification and assessment of the potential effects on off-site designated assets.
- 5.3 It also identifies and assesses the nature and magnitude of effects upon 'non-designated' archaeological remains.

DESIGNATED HISTORIC ASSETS

- 5.4 The following paragraphs will address **Stages 2, 3 and 4** of Cadw (2017b) insofar as they relate to the two assets which might be affected by the development

Grade II* listed George Street Bridge (25847)

Stage 2 – Define and analyse the setting, to understand how it contributes to the asset's heritage significance

The Asset and its Significance

- 5.5 The closest designated historic asset to the Site comprises the Grade II* listed building of George Street Bridge (**25847**), located adjacent to the west/north-west of the Site (**Image EDP A1.2**).
- 5.6 Following consultation carried out in October/November 2024 with NCC this assessment has been updated, and a revised assessment is presented in the Heritage Technical Note at **Appendix EDP 4**.

Grade I listed Transporter Bridge including E and W anchor chambers (3076)

Stage 2 – Define and analyse the setting, to understand how it contributes to the asset's heritage significance

The Asset and its Significance

- 5.7 The Grade I listed 1906 built Transporter Bridge including E and W anchor chambers (**3076**), comprises the earliest standing bridge in Newport. The bridge is currently closed, subject to ongoing restoration and repairs. It is located c.1.4km south of the Site.
- 5.8 Cadw's listed building record description for the asset is as follows:

“One of only 2 functioning major transporter bridges in the UK. Opened 12 September 1906. Joint engineers R H Haynes, Borough Engineer of Newport, and Ferdinand Arnodin,

internationally famous as inventor and engineer of transporter bridges in Europe and North Africa. Contractor Alfred Thorne of Westminster. Traffic of tall-masted ships to wharves above the bridge meant traditional bridge structures were not practicable, and the river had to be spanned at high level. Height approximately 72m, clear span 196m. Restoration 1990's, including repairs to steelwork, and new cables; reopened December 1995.

The structure consists of 2 towers each of 2 elliptical lattice-girder pylons which support, at high level, a main boom upon which a trolley operated by continuous cable, powered by drum driven by two 35bhp direct current electric motors in cabin on the E side of the river, transports a gondola suspended by cables from the trolley. The boom is on the suspension bridge principle, supported both by oblique stay cables attached to the pylons, and by catenary cables anchored in chambers on each side of river. Pedestrian access to upper level by stairs on NE and SW pylons. Towers pin-jointed to bearings supported on bell-shaped masonry piers (4 to each tower). On the E side is winding house raised above roadway on steel girders; 5 windows, walls of steel and wooden boarding, slate roof with iron cresting and finials. Wooden platform with iron gates, railings and turnstile to W. Iron gates, railings and turnstile on W bank. Gondola suspended from cables; gates to E and W. To N and S sides of gondola are shelters of steel girder and mesh construction, wooden handrails; wooden roofs with zig-zag valences. Above shelter on N side is octagonal operator's cabin with pagoda roof.

On each bank, approximately 140m away from bridge is an anchor chamber in which the main cables of the bridge are anchored; brown rock-faced stone; later additions."

5.9 The reason for its listing is as follows:

"Graded I as finest and largest transporter bridge in Great Britain, the only one in the UK by Arnodin. One of only a handful of surviving transporter bridges in the world."

5.10 As such, the heritage significance of the 1906 built Transporter Bridge is primarily derived from its illustrative historical value as one of two remaining early 20th century steel major transporter bridges in Britain, as well as its associative historic value with the internationally famous French inventor and transporter bridge engineer Ferdinand Arnodin and Newport Borough Council engineer R. H. Haynes. The historical value of the bridge is experienced through its physical fabric and appearance. Therefore, the bridge holds a high degree of evidential value also, which enables its design and engineering construction techniques to be understood.

5.11 The bridge holds some aesthetic value, given its innovative design of its time with its elliptical lattice-girder pylons and main boom which operated the trolley and gondola held by suspension cables. The bridge also features as a prominent landmark structure along the River Usk towards the estuary and adjacent to Alexandra Docks. This is on account of its appearance, height and scale from its two towers, connecting boom and cables leading to its two respective anchor points, situated on the west and east banks of the river. The bridge to a small degree also holds social communal value through its purpose and function as a bridge crossing across the River Usk in Newport for trade and the local community.

Setting and Contribution to Significance

- 5.12 Due to the bridge's prominence, its setting is also broad. The asset is experienced from many locations across Newport's urban landscape, which includes the bridge's more immediate surroundings, such as along the A48 and City Bridge (**Image EDP A1.20**) and more distant locations, such as Newport Bridge (**Image EDP A1.5**), Vicarage Hill (**Image EDP A1.21**) and Belle Vue Park (**Image EDP A1.22**). This is due to various factors, including the height and prominence of the bridge, the varying built form across Newport and undulating topography of the area.
- 5.13 The bridge is best experienced from its more immediate surroundings, which comprise the A48, Newport Port (i.e. Alexandra Docks), Coronation Park and eastern approach along Stephenson Street (e.g. **Image EDP A1.20**). From within its immediate setting, the bridge features prominently in views across the River Usk. This experience contextualises its function and enables the historical value of its architectural design and engineering to be fully illustrated, and therefore, enables a full appreciation and understanding of its heritage significance to be achieved. As such, it is considered that the asset's more immediate setting elements, outlined above, provide a moderate positive contribution to its heritage significance, this is particularly relevant to the roads approaching the bridge (i.e. the A48 and Stephenson Street).
- 5.14 The wider urban landscape setting of Newport shares no direct relationship with the asset. Although the bridge can be experienced in views from various locations across Newport, the experience of such views comprises distant views of the bridge within its more immediate riverside surroundings. Such an experience as illustrated via **Image EDP A1.5** and **Image EDP A1.21-22**, does not reflect any intentionally designed landscape views, rather incidental views of the bridge on account of its prominence, topography of the area and surrounding urban built form of Newport. As such, the wider urban landscape setting of Newport provides a neutral contribution to the asset's heritage significance.

Relationship to the Site

- 5.15 The Site is located c.1.4km north of the bridge, within the wider urban landscape setting of the bridge within Newport. The Site comprises an area of disused, vacant land, upriver from the bridge, beyond the intervening built form of residential and commercial developments along the west side of the River Usk. Consulted sources in **Section 3** have identified no historical association or connection between the Site and historic asset.
- 5.16 The September 2024 site walkover identified that partial views of the Transport Bridge can be experienced from within the Site, comprising the uppermost parts of the bridge's two towers and parts of its boom. However, such views are largely obstructed by existing modern residential blocks along the west side of the River Usk (e.g. Selskar Court – River Front).
- 5.17 The experience of the bridge from the Site comprises an incidental view, one of many possible views from within the asset's wider urban landscape setting of Newport. The view is not reflective of any intentionally designed experience of the asset, nor does this limited experience of the bridge from the Site enable the asset's heritage significance to be fully appreciated and understood. As such, the Site is considered to form part of the wider Newport urban landscape setting to the bridge, which provides a neutral contribution to the asset's heritage significance.

Stage 3 – Evaluate the potential impact of development

- 5.18 The site walkover identified that the proposed Development has the potential to partially obstruct a view towards the Transporter Bridge from along a small portion of the east end of the carriageway along the Grade II* George Street Bridge (**25847**) (**Image EDP A1.23**).
- 5.19 The nature of the experience of the Transporter Bridge from George Street Bridge is limited to the upper parts of the Transporter Bridge only where the structure is experienced in the distance rising above and between later developments as one moves over the George Street Bridge. Such an experience does not readily enable the historical or architectural value of the Transporter Bridge, expressed through its architectural design and engineering, to be fully experienced from within its immediate setting. Therefore, the bridge's heritage significance is unable to be fully appreciated or understood from George Street Bridge, as per the experience from within the Site. As such, the intervisibility between the two bridges is not reflective of any intentional design which provides a positive setting contribution from one asset to the other.
- 5.20 The two bridges are of two different construction dates, architectural designs, scales and appearances with different sets of architects and engineers. As such, the distant experience of the Transporter Bridge from George Street Bridge is incidental in nature, afforded on account of their respective heights and prominence as landmark structures along the River Usk in Newport. This is the only shared connection they have, being two prominent listed landmark bridges within Newport.
- 5.21 While the Transporter Bridge can be glimpsed looking over the Site from the very eastern approach onto the George Street Bridge (**Image EDP A1.23**), the experience is limited by intervening built form and the more open, unobstructed views of the Transporter Bridge are obtained from the centre of the George Street Bridge (e.g. **Image EDP A1.24**), where one does not overlook the Site. As such, there is no suggestion that the experience of the Transporter Bridge from George Street Bridge looking over the Site is a key view of the Grade I listed bridge, or even represents a locally notable view of the bridge.
- 5.22 The Proposed Development will result in the obstruction of limited glimpses of the distant Transporter Bridge from the very eastern end of George Street Bridge, leaving the more open, unobstructed views towards the Transporter Bridge from the centre of George Street Bridge entirely unaffected. As such, the localised loss of an incidental view of the Transporter Bridge from one small section of the George Street Bridge through the implementation of the Proposed Development, is not expected to materially affect the experience of the Transporter Bridge, result in any adverse effect to the setting of the Transporter Bridge, nor harm its heritage significance.

NON-DESIGNATED HISTORIC ASSETS

- 5.23 The Site's archaeological potential has been identified to comprise a very low potential for prehistoric through to medieval remains based on the absence of previously recorded remains, the depth of potential archaeological bearing alluvial deposits within the Site and the inundated historic landscape character of the Site being situated on wetland, prior to its land drainage and reclamation.

- 5.24 Archaeological remains most likely to be present within the Site comprise late post-medieval 19th century and modern mid-20th century onwards structural remains within existing made ground deposits. Such remains are unlikely to be well-preserved given the Site's known successive demolition events, with associated remains most likely to comprise floor surfaces, walls, demolition rubble and/or foundations. Such remains would be of negligible heritage significance for late 19th century remains and no historic interest or heritage significance for modern 20th century remains.
- 5.25 Consultation with Heneb for Coverack Road – Phase 1, located to the north-west of the present site (see **Appendix EDP 3**), suggested that there was no suitable mitigation for the impact of that development's piled foundations and so no archaeological monitoring was deemed necessary in that instance. As the current proposals will be utilising the same construction methods, there would be no appropriate way of monitoring the groundworks associated with the Proposed Development's piling within the Site.
- 5.26 Therefore, in light of the proposed construction methodology, in combination with the very low archaeological potential of the Site and the fact that no archaeological remains of significance are likely to be adversely affected there should be no need for any archaeological mitigation in respect of the development proposals for the Site.

Section 6

Conclusions

- 6.1 This Archaeological and Heritage Assessment for Hedyn was produced by EDP to accompany a planning application for a residential development at Coverack Road - Phase 2, Newport ('the Site').

DESIGNATED HISTORIC ASSETS

- 6.2 The Site does not contain any designated historic assets, such as world heritage sites, scheduled monuments, listed buildings, registered historic landscapes, registered historic parks and gardens or conservation areas. Therefore, none will be physically affected by the proposed development within the Site.
- 6.3 In line with Cadw 2017b setting assessment guidance, the Proposed Development was identified to have the potential to affect the setting of the Grade II* listed George Street Bridge (**25847**), located adjacent to the north-west of the Site, as well as the Grade I listed Transporter Bridge (**3076**), located c.1.4km south of the Site.
- 6.4 In accordance with the revised assessment presented in the Heritage Technical Note at **Appendix EDP 4**, the assessment concludes that the Proposed Development would within the setting of the Grade II* listed building St George Bridge but that it would represent a neutral element of its setting that would not result in any adverse loss of its significance.
- 6.5 Furthermore, it also concludes that the development of the site would result in the loss of an area that presently represents negative element of the setting of the bridge which detracts from its significance to a low degree. It also concludes that the provision of a heritage information board would further the interpretation of the asset to the public and would result in an additional minor benefit to the significance of the bridge.
- 6.6 The assessment concludes that the Proposed Development has the potential to affect an incidental partial, limited view of the Grade I Transporter Bridge including E and W anchor chambers (**3076**) from the east end of the carriageway to George Street Bridge, above and adjacent to the Site (**Image EDP A1.23**). This view was identified to comprise one of a number of such distant views from within the wider urban landscape setting of the bridge within Newport, which provides a neutral contribution to the asset's heritage significance. The loss of such view from a small portion of the bridge would result in no adverse setting effect to the Grade I Transporter Bridge including E and W anchor chambers (**3076**). Therefore, the Proposed Development would have no effect on the Transporter Bridge's heritage significance.
- 6.7 No other designated historic assets were identified to have the potential to have their setting or significance affected by development within the Site. As such, none would be affected by the Proposed Development.

NON-DESIGNATED HISTORIC ASSETS

- 6.8 Based on current evidence, the Site most likely comprised of a wetland area along the eastern bank of the River Usk, subject to frequent inundation overtime and limited to pastoral agricultural land uses, prior to the Site's industrial development from the late 19th century onwards.
- 6.9 It is likely that the ground was subsequently built up with made ground deposits over the course of the late 19th and 20th century, through its successive phases of development associated with the Site's late 19th coal storage depot use and later mid-20th century onwards 'Uskside Paint Mills' site. Such successive phases of development involved periodic construction, demolition and relocation of buildings across the Site.
- 6.10 The Site's archaeological potential has been identified to comprise a very low potential for prehistoric through to medieval remains. This is based on the following: the absence of previously recorded remains; the recorded depth of alluvial deposits with the potential to contain archaeological remains, located below thick deposits of made ground within the Site; and the historic landscape character of the Site comprising a historic wetland environment, frequently subject to inundation until land drainage and reclamation occurred during the late post-medieval period.
- 6.11 The Site has a high potential for late post-medieval 19th century and modern 20th century structural remains, associated with its former industrial storage use and later 'Uskside Paint Mills' site. Such remains are located within existing made ground deposits. Furthermore, remains are unlikely to be well-preserved given the Site's known successive demolition events, with associated remains most likely to comprise floor surfaces, walls, demolition rubble and/or foundations. Such remains would be of negligible heritage significance for late 19th century remains and no historic interest or heritage significance for modern 20th century remains.
- 6.12 Given that all previous buildings within the Site have either demolished and/or removed, it is unlikely that any significant remains are still existing. Further to this, it is likely that piles will be used to support the Proposed Development's flat block. These would be the only groundworks element of the proposals that would extend to such a depth that they would have the potential to disturb earlier archaeological bearing deposits located beneath recorded made ground depths of c.3.3-4.6m within the Site.
- 6.13 Consultation with Heneb for Coverack Road – Phase 1, located to the north-west of the present site (see **Appendix EDP 3**), suggested that there was no suitable mitigation for the impact of that development's piled foundations and so no archaeological monitoring was deemed necessary in that instance. As the current proposals will be utilising the same construction methods, there would be no appropriate way of monitoring the groundworks associated with the Proposed Development's piling within the Site.
- 6.14 Therefore, in light of the proposed construction methodology, in combination with the very low archaeological potential of the Site and the fact that no archaeological remains of significance are likely to be adversely affected there should be no need for any archaeological mitigation in respect of the development proposals for the Site.

- 6.15 Overall, the Proposed Development is considered to be compliant with legislation and national and local planning policies set out in **Section 2** of this Archaeological and Heritage Assessment.

Section 7 References

- Bradburn S., 2006. BRC Building Lower Dock Street Newport: Archaeological Watching Brief. Glamorgan-Gwent Archaeological Trust. Report.
- British Geological Survey, 2024. Geology Viewer. [Online]. Available at: https://geologyviewer.bgs.ac.uk/?_ga=2.88011035.2012679632.1661154102-1160254231.1661154102.
- Cadw, 2011. Conservation Principles. [Online]. Available at: <https://cadw.gov.wales/advice-support/historic-assets/conservation-principles>. Cadw 2017a. Heritage Impact Assessment in Wales. [Online]. Available at: <https://cadw.gov.wales/sites/default/files/2019-05/20170531Heritage%20Impact%20Assessment%20in%20Wales%2026917%20EN.pdf>.
- Cadw, 2017a. Heritage Impact Assessment in Wales. [Online]. Available at: <https://cadw.gov.wales/sites/default/files/2019-05/20170531Heritage%20Impact%20Assessment%20in%20Wales%2026917%20EN.pdf>.
- Cadw, 2017b. Setting of Historic Assets in Wales. [Online]. Available at: <https://cadw.gov.wales/sites/default/files/2019-05/Setting%20of%20Historic%20Assets%20in%20Wales%20EN.pdf>.
- Cadw, 2017c. Managing Conservation Areas in Wales. [Online]. Available at: <https://cadw.gov.wales/sites/default/files/2019-05/20170531Managing%20Conservation%20Areas%20in%20Wales%2028424%20EN.pdf>.
- ClfA, 2020. Standard and guidance for desk-based assessment. [Online]. Available at: <https://www.archaeologists.net/codes/cifa>.
- Crowther S. & Dickson A., 2008 Severn Estuary Rapid Coastal Zone Assessment Survey, National Mapping Programme. English Heritage.
- Dunning R. 2006. Newport Riverside Park, Newport: Archaeological Watching Brief. Glamorgan-Gwent Archaeological Trust. Report.
- EDP, 2018. Land at Galliford's Yard, Newport: Heritage Impact Assessment. Report Ref. edp5080_r001b.
- Google Earth, 2024. Satellite imagery.
- His Majesty's Stationery Office (HMSO), 1979. Ancient Monuments and Archaeological Areas Act 1979. [Online]. Available at: <https://www.legislation.gov.uk/ukpga/1979/46>.
- His Majesty's Stationery Office (HMSO), 1990. Planning (Listed Buildings and Conservation Areas) Act 1990. [Online]. Available at: www.legislation.gov.uk/ukpga/1990/9/contents
- Kidson C. & Heyworth A., 1973. The Flandrian sea level rise in the Bristol Channel. Proceedings of the Ussher Society. Volume 2. Pages 565-84. Journal.

Kidson C. & Heyworth A., 1976. The Quaternary deposits of the Somerset Levels. Quarterly Journal of Engineering Geology and Hydrogeology. Volume 9. Pages 216-235. Journal.

Landmark Information Group, 2024. Envirocheck Analysis Report - Historic Map Pack.

National Library of Wales, 2024. 1836 John Wood Plan of Newport. [Online]. Available at: <https://www.library.wales/discover-learn/digital-exhibitions/maps/town-plans/john-woods-welsh-town-plans/newport-1836>.

Newport City Council, 2013. Local List: Background Paper and Register – Newport Local Development Plan 2011-2026. [Online]. Available at: <https://www.newport.gov.uk/documents/Planning-Documents/LDP-2011-2026/Local-List-June-2013.pdf>.

Newport City Council, 2015. Newport Local Development Plan 2011-2026. [Online]. Available at: <https://www.newport.gov.uk/en/Planning-Housing/Planning/Planning-policy/Local-Development-Plan/Local-Development-Plan.aspx>.

Newport City Council, 2024a. Newport Replacement Local Development Plan. [Online]. Available at: <https://newportldp.co.uk/>.

Newport City Council, 2024b. Lower Dock Street. [Online]. Available at: <https://www.casnewydd.gov.uk/cy/Planning-Housing/Planning/Conservation/Conservation-areas/Lower-Dock-Street.aspx>.

Rippon S., 1997. The Severn Estuary: Landscape Evolution and Wetland Reclamation. Leicester University Press.

Sell S. 2008. City Centre Campus, Newport: Archaeological Watching Brief. Glamorgan-Gwent Archaeological Trust. Report.

TEC, 2008. Coverack Road, Newport: Preliminary Geo-Environmental and Geotechnical Assessment. Report Ref. 0803007.001.01.

Terra Firma, 2018, Geotechnical and Geo-Environmental Site Investigation Report: Proposed Residential Development, Coverack Road, Newport, NP19 0DR. Report.

The Genealogist.com, 2024. Homepage. [online]. Available at: <https://www.thegenealogist.co.uk/>.

Welsh Government, 2017. Technical Advice Note (TAN) 24: The Historic Environment. [Online]. Available at: <https://www.gov.wales/technical-advice-note-tan-24-historic-environment>.

Welsh Government, 2021. Future Wales: The National Plan 2040. [Online]. Available at: <https://www.gov.wales/future-wales-national-plan-2040-0>.

Welsh Government, 2024. Planning Policy Wales Twelfth Edition. [Online]. Available at: <https://www.gov.wales/planning-policy-wales>.

Appendix EDP 1 Images



Image EDP A1.1: South-east facing view of the Site's ground conditions from Grade II* George Street Bridge (25847).



Image EDP A1.2: North-west facing view of the Site ground conditions from the north-east corner of the Site. Image also illustrates the proximity of the Site to the Grade II* George Street Bridge (25847).



Image EDP A1.3: South-east facing view towards the Grade II* listed George Street Bridge (25847) from the riverside walk next to Britannia House illustrating the scale of the extant built form adjacent to the bridge. The Proposed Development would be visible on the left side of this image, between the left concrete masts and flat blocks associated with the Coverack Road – Phase 1 development. However, the development would be no higher than existing buildings either side of the bridge. As such, it would not compete with the landmark status of the structure in Newport



Image EDP A1.4: South-east facing view of the Grade II* listed George Street Bridge (25847) from the 2006 built Newport City Footbridge. The Proposed Development would not be visible from this view towards the bridge, being situated behind existing flat blocks on the left side of the bridge in this image. This is due to the development being no higher than existing buildings either side of the bridge, which would not compete with the landmark status of the structure in Newport.



Image EDP A1.5: South-east facing view down the River Usk towards the Grade II* listed George Street Bridge (25847) from the Grade II listed 1927 built Newport Bridge (23139). The Proposed Development would not feature in any view from the Newport Bridge, with the central and western side of the George Street Bridge only visible from the length of Newport Bridge.



Image EDP A1.6: North facing view of the Grade II* listed George Street Bridge (25847) from the riverside walk parallel to East Dock Street. The Site would feature adjacent to the right side of the Grade II* listed George Street Bridge (25847) in this image, between the right concrete masts and trees along the east side of the river.



Image EDP A1.7: North-west facing view of the Grade II* listed George Street Bridge (25847) from the 2004 built City Bridge.



Image EDP A1.8: South-west facing view from Corporation Road down Coverack Road. Image looking down Coverack Road towards the Site and the Grade II* listed George Street Bridge (25847), beyond the terraced row of housing on the right side of the street. As shown neither are visible from the junction between Coverack Road and Corporation Road.



Image EDP A1.9: West facing view from the corner of Coverack Road and Witham Street towards the Grade II* listed George Street Bridge (25847)



Image EDP A1.10: West facing view from the corner of Coverack Road and Feering Street towards the Grade II* listed George Street Bridge (25847).



Image EDP A1.11: West facing view from the southern end of Coverack Road adjacent to the Site. View towards the Grade II* listed George Street Bridge (25847).



Image EDP A1.12: South—west facing view down Moris Street towards the Grade II* listed George Street Bridge (25847)



Image EDP A1.13: South facing view from Corporation Road down Cyril Street towards the Grade II* listed George Street Bridge (25847) once more illustrating how the extant developments either side of the bridge of no more than six-storeys on the east side of the River Usk do not compete with the structure's landmark status.



Image EDP A1.14: West facing view from the Corner of Klevedon Street and Feering Street towards the Grade II* listed George Street Bridge (25847).



Image EDP A1.15: West facing view from the corner of Klevedon Street and Witham Street towards the Grade II* listed George Street Bridge (25847).



Image EDP A1.16: East facing view from the west side of the River Usk. Image to show the scale, massing and height of the Coverack Road – Phase 1 development adjacent to the Grade II* George Street Bridge (25847). This image illustrates how the Coverack Road – Phase 1 development at five-six storeys does not compete with the landmark status of the bridge. The Site is located in the open space to the right of the bridge in this image and would similarly not affect the bridge’s landmark status.



Image EDP A1.17: South-west facing view from the west side of the River Usk to show the scale, massing and height of the approximately three-storey ‘Castle Bingo’ development adjacent to the Grade II* listed George Street Bridge (25847).



Image EDP A1.18: South-west facing view from the Site towards the seven-storey Newport Student Village flat block development on the west side of the River Usk, to show its scale, massing and height in comparison to the adjacent Grade II* listed George Street Bridge (25847).



Image EDP A1.19: North facing view of the seven-storey Newport Student Village flat block development on the west side of the River Usk. Image to show the scale, massing and height of the flat block in relation to the adjacent Grade II* listed George Street Bridge (25847).



Image EDP A1.20: South-west facing view from 2004 built City Bridge towards the Grade I listed Transporter Bridge including E and W anchor chambers (3076).



Image EDP A1.21: South-east facing view from Vicarage Hill towards the Grade I listed Transporter Bridge including E and W anchor chambers (3076).



Image EDP A1.22: South-east facing view from Belle Vue Park towards the Grade I listed Transporter Bridge including E and W anchor chambers (3076).



Image EDP A1.23: South facing view from the Grade II* George Street Bridge (25847) adjacent to the Site, towards the Grade I listed Transporter Bridge including E and W anchor chambers (3076), showing the distant glimpse of the bridge behind later developments



Image EDP A1.24: South facing view towards the Grade I listed Transporter Bridge including E and W anchor chambers (3076) from the centre of the Grade II* George Street Bridge (25847). Image to illustrate how clear, full views of the Transporter Bridge from along the centre of the George Street Bridge will be unaffected by development within the Site.

Appendix EDP 2

NCC Historic Buildings Conservation Officer Consultation

From: Smith, Laura (Historic Building Conservation Officer) <Laura.Smith@newport.gov.uk>
Sent: Friday, July 19, 2024 1:43 PM
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Subject: Re: P.24.0058 - Follow up

Hi Geraint,

I have had a look over the proposals and the heritage assessment for 40 flats at Coverack Road. The site is next to the grade II* listed George Street Bridge, therefore forms part of its setting. In principle, I would be happy to see the site redeveloped, however I have concerns with the layout of the site and scale of the proposed building. It is understood that there are contemporary buildings to all sides of the bridge, hence my lack of objection to the redevelopment of the site. Furthermore, the setting of the bridge has been altered significantly through these more recent developments.

Nevertheless, from looking at both the site plan and contextual elevations, it is evident that this block would be significantly closer to the grade II* listed bridge and inhibit views of the bridge entirely when accessing from Coverack Road. I don't think this has been sufficiently addressed or justified within the heritage assessment.

Furthermore, there are some highly important views when progressing along the bridge from Corporation Road; specifically views of the Grade I Transporter Bridge. Prominent glimpses of this iconic, nationally important structure are somewhat rare in Newport, and this particular location allows for a full panoramic view of the bridge sitting firmly within the cityscape. The proposed development obstructs a significant proportion of this view from one listed bridge to another, thus creating a visual disturbance to both of their setting's. Again, this has not been considered to an appropriate degree within the application. I have attached a document which shows these significant views of each listed bridge.

There are a couple of ways this could be addressed. Firstly, the orientation and plan form of the building could be altered to allow these views to remain prominent from both areas mentioned above. It would also mean the building sits further away from the bridge, reducing impact on its immediate setting. Secondly, the building could be reduced in height/stepped down where it sits closest to the bridge, this would have to sit below the line of the structure so these important vistas are retained. To ensure this is done correctly, a visual assessment should be completed.

Overall, I could not support these proposals if they were to be submitted as a full planning application. I strongly advise that the scheme is reconsidered prior to any further submission. If you have any queries, please do not hesitate to ask.

Many thanks,

Laura Smith

Prif Swyddog Treftadaeth / Principal Heritage Officer
Adfywio a Datblygu Economaidd / Regeneration and Economic Development
Cyngor Dinas Casnewydd / Newport City Council

T: 07773657439 | E: Laura.Smith@newport.gov.uk | Planning@newport.gov.uk







Appendix EDP 3
Coverack Road – Phase 1 Consultation with Glamorgan-Gwent
Archaeology (Heneb)

Our ref.: NEW0954/CNM

CURATORIAL DIVISION

Planning Services Division
Newport City Council
Civic Centre
NEWPORT
NP9 4UR

10th May 2010

FAO Tracey Brookes

Dear Sir

Re: Proposed Residential Development
Land at Bankside Coverack Street, Newport
PL.App.No. 09/1243

Thank you for consulting us on this application.

The proposed development site is located on the alluvial flood plain of the River Usk. Considerable recent work has shown that human activity in this area has occurred for at least 6000 year and that due to the waterlogged conditions organic material is well preserved in this area making any archaeological sites that are discovered of national importance. However in this case there are no identifiable indications that archaeological features are located in the application area and no features such as "pills" (small estuaries caused by tributaries to the Usk) that provide a focus for potential settlement site.

Consequently in our opinion as your archaeological advisors there is currently insufficient evidence that a site of national importance is located in the application area for us to recommend that an archaeological evaluation should be carried out prior to any positive determination of the current application (although we suggest that the applicant should carefully consider the advantages of commissioning such works in advance of construction works commencing). However we strongly recommend that a condition should be attached to any consent granted by your Members. This condition will require the applicants to submit and implement a programme of archaeological investigation prior to and during the development and should be worded in a manner similar to the model given in Welsh Office circular 60/96 paragraph 23, which reads: -

"No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority."

Reason: *To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.*

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It is expected that the required programme of investigation will include an archaeologist undertaking a watching brief during all exploratory works required for the development and also during the construction works. Contingency arrangements will also need to be agreed in case unexpected archaeological features are revealed during the works.

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

Yours faithfully

A handwritten signature in dark ink, appearing to read 'N Maylan', with a long, sweeping horizontal stroke extending to the right.

Neil Maylan
Archaeological Planning Manager

Appendix EDP 4
Heritage Technical Note
(edp8348_r002)

Coverack Road, Phase 2, Newport

Heritage Technical Note

edp8348_r002b

QA: RSk/ACr_FMi/FMi_240425

1 INTRODUCTION

1.1 This Heritage Technical Note has been written by The Environmental Dimension Partnership Ltd (EDP) on behalf of Hedyn. It sets out a rebuttal to an email that was issued by the Principal Planning Officer (PPO) at Newport City Council (NCC) on 28 November 2024 (hereafter referred to as 'the email'; **Appendix EDP 1**).

1.2 The email responds to additional information supplied as part of an ongoing process of consultation with the Principal Heritage Officer (PHO) at NCC, with regard to proposals to develop a five-storey block of 40 affordable homes (flats) at Coverack Road, Newport. The stages of this consultation are summarised below:

- NCC provided commentary on 19 July 2024 in respect of the development proposals, and an accompanying Archaeological and Heritage Assessment (report reference: edp8348_r001, September 2024), as part of a pre-application consultation;
- In response to this commentary, the Archaeological and Heritage Assessment report was updated with further information and observations provided and re-issued;
- Following the re-issue of the report, a meeting was held on 23 October 2024 between the PPO and PHO and the project team, at which the revised assessment was discussed;
- Following this meeting, an additional set of visualisations showing the proposals was issued to the NCC officers, in order to provide additional information to supplement the assessment; and
- An email was issued by NCC in response to the visualisations submitted by the applicant on 28 November 2024.

1.3 Since then, the proposals have been further updated, with the updated scheme illustrated on the plans and drawings at **Appendix EDP 2**. Notably, the proposals now include:

- Street-side placemaking and landscaping improvements along Coverack Road; and
- Provision for a heritage information board on Coverack Road that provides information on the Grade II* listed building George Street Bridge.

- 1.4 The NCC email reiterates the position of the officers, as previously expressed in respect of the effect of the proposals on the setting and significance of the Grade II* listed building George Street Bridge (Cadw Reference: 25847).
- 1.5 The email states how NCC have “*concerns over the massing of the proposal and its impact on views of the Bridge particularly from Coverack Road*” and conclude that they disagree with the conclusions of the Archaeological and Heritage Assessment, and specifically that they “*conclude that the proposal would have a substantially adverse impact on the setting of the listed Bridge and our concerns are not allayed by the additional information, in fact they are reinforced.*”
- 1.6 NCC also state that they would need a “*very thorough and robust justification*” arrived at under the methodologies set out in Cadw’s guidance, *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (CP; Cadw, 2011) and *Setting of Historic Assets in Wales* (SHAW; Cadw, 2017) to support the conclusions reached in the Archaeological and Heritage Assessment.
- 1.7 This Heritage Technical Note reviews their response and presents a reiteration of the assessment of the effects of the proposed development on the setting of the Grade II* listed George Street Bridge, in accordance with the referenced guidance and also making reference to the conclusions of the submitted Archaeological and Heritage Assessment. Images that help illustrate the argument are located at **Appendix EDP 3**.

Setting Assessment Methodology

- 1.8 Given that the NCC response is based on effects from change within the settings of a historic asset, this Note makes reference to the definition of setting given in CP which defines setting as:
- “The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape.”*
- 1.9 SHAW adds to this definition, stating that the extent of setting is not fixed and may change as the asset and its surroundings evolve. It also states that:
- “Elements of a setting may make a positive, negative or neutral contribution to the significance of an asset.”*
- 1.10 Importantly, SHAW states that “*Setting is not itself a historic asset, though land within a setting may contain other historic assets*” and that “*the importance of setting lies in what it contributes to the significance of a historic asset..*”.
- 1.11 In that regard, ‘significance’ is defined in CP as “*the sum of the cultural heritage values*” possessed by a historic asset. In this regard CP defines four heritage values, which are summarised as:
- **Evidential value**, which is defined as those elements of the historic asset that can provide evidence about past human activity, including its physical remains or historic fabric;

- **Historical value**, which is defined as those elements of an asset which might illustrate a particular aspect of past life or might be associated with a notable family, person, event or movement;
- **Aesthetic value**, which is defined as deriving from the way in which people draw sensory and intellectual stimulation from the historic asset; and
- **Communal value**, which is defined as deriving from the meanings that a historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory.

1.12 Set within this context, it is necessary to first define the significance of the asset in question, and the contribution made to that significance by its 'setting', in order to establish whether development would result in a loss of this contribution and therefore a negative impact upon the asset's significance. The guidance identifies that change within a heritage asset's setting need not necessarily cause a negative impact and that it can be positive, negative or neutral.

1.13 On a practical level, SHAW identifies an approach to assessing setting, which is based on a four-stage procedure; i.e.:

- Stage 1: Identify the historic assets that might be affected by a proposed change or development;
- Stage 2: Define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which the assets are understood, appreciated and experienced;
- Stage 3: Evaluate the potential impact of a proposed change or development on that significance; and
- Stage 4: If necessary, consider options to mitigate or improve the potential impact of a proposed change or development on that significance.

1.14 The Archaeological and Heritage Assessment (report reference: edp8348_r001, September 2024) followed this procedure. It outlined the assessment of effects on historic assets from the proposed development in line with the staged approach in SHAW recommended by Cadw. In turn, the assessment presented in this Note also follows the same staged procedure.

2 HERITAGE ASSESSMENT

2.1 This section sets out an assessment of the potential effects of the proposed development on the Grade II* listed George Street Bridge. Where relevant, it makes reference to comments made in the NCC email. The assessment addresses the Cadw staged process, with Stage 1 defining that the scope is restricted to the George Street Bridge as the only asset with potential to be affected by the development.

Stage 2: Define and Analyse the Settings to understand how they Contribute to the Significance of the Historic Assets and, in particular, the ways in which the Assets are Understood, Appreciated and Experienced

- 2.2 SHAW recommends that Stage 2 should identify the key factors relating to setting which contribute to the significance of the historic asset.
- 2.3 As such, the first task is to define the significance of the listed bridge, in respect of the four values which are set out in CP.
- 2.4 Cadw's listed building record description for the asset reads thus:

"Begun in 1962, and opened 9 April 1964. The first cable-stayed cantilever bridge in Britain. By Mott, Hay & Anderson, and the Borough Engineer D P Cartwright. The designers were also responsible for the Wye Viaduct (the approach to the Severn Bridge, Chepstow), on the same principle, which has since been altered for strengthening reasons. The principle was also used for the Second Severn Crossing, 1992-96. Unlike a suspension bridge where the deck is supported by secondary cables (or chains) hanging from principal cables (or chains), slung from piers or masts, in a cable-stayed bridge, the deck is supported directly by cable stays running over the masts, anchored on the landward side.

Cable-stayed cantilever road bridge. Two pairs of concrete masts have 3 sets of 4 cable stays which support span of bridge. The approaches are supported on cylindrical concrete pillars. The bridge carries 4 carriageways, and a pedestrian footway to each side. A set of concrete steps to each side of bridge near W masts."

- 2.5 The reason for its designation is given in the citation as: *"Graded II* as major civil engineering structure, the first cable-stayed cantilever bridge in Britain"* and so the following paragraphs will consider the values which underpin that significance.

Evidential Value

- 2.6 Given the importance of the bridge's engineering and the technical innovation inherent in its design, the bridge possesses a considerable degree of evidential value in that its physical fabric demonstrates the successful first application of the cable-stayed cantilever technology in Britain.
- 2.7 This value is contained within all parts of the bridge, its components and materials, which were selected for their contribution to the bridge's function. It is also reflected in documentary evidence and designs that probably still exist, and which provide evidence of the thinking that underpins the bridge's design and development.
- 2.8 Therefore, the bridge holds a high degree of evidential value which is a key contributor to its overall heritage significance.

Historical Value

- 2.9 The bridge also possesses a considerable degree of historical value, as both illustrative and associative values. Its key association is with the architects Mott, Hay & Anderson, and the former Newport Borough Council Engineer D. P. Cartwright.

- 2.10 Mott, Hay and Anderson were formed by three civil engineers who are all individually renowned for their work on various high-profile engineering projects of the late 19th and early 20th centuries across the UK. The company, formed in 1923, is known for its involvement in mid-20th century bridge construction, where, in addition to the George Street Bridge, they designed the Tyne Bridge in Newcastle and were part of a collaboration that built the Severn Road Bridge. The company went on to form one part of the modern engineering firm, Mott MacDonald.
- 2.11 In this regard, the bridge has an important associative aspect to its historical value, being one of a series of well-known, innovative British bridges that were built by some of the country's most important architects of the era.
- 2.12 The bridge is also associated with the process of decision-making that occurred within the local authority that led to its construction. In this regard, the bridge was deemed necessary as a response to traffic problems on the existing A48 Town Bridge following the growth of the city's population.
- 2.13 In terms of its illustrative value, the bridge's presence illustrates the mid-20th century application of engineering technology to solve a local transport issue, illustrating the city's response to its growth in the modern era. Its appearance is discussed below in respect of its aesthetic value, but its stark, functional, Brutalist style illustrates a functional and rational architectural response, typical of the mid-20th century, and so its presence is illustrative of the approach to civil architecture of that era, and of the Modern, mid-century vision of how the urban landscape should look.
- 2.14 Given the importance of its historical associations and its illustration, on a grand scale of the nature of mid-20th century modern, urban development, the bridge's historical value is a major contributor to its overall heritage significance.

Aesthetic Value

- 2.15 The bridge's architecture is entirely functional, with its concrete structure, masts and cables designed solely to suit the required parameters for its cable-stayed cantilever design. In this regard the structure fits the mid-century, Modernist approach in architecture that rejected nostalgia for earlier architectural styles and decorative embellishment, instead focussing on functionalism, simplicity and the honest expression of materials. This approach was, in the 1950s, coined 'Brutalism' and taken from the French term 'beton brut' or 'raw concrete'.
- 2.16 The philosophy behind Brutalism has been described as one that prioritises function, honesty and social purpose, and the movement is associated with socialist utopian ideas of the mid-20th century. The works ascribed as Brutalist have often been criticised for being dark, cold, too austere or overly imposing.
- 2.17 The George Street Bridge accords well with the Brutalist style. Aside from its cables, the bridge uses concrete exclusively for its structure which is unpainted, of a dark colouration and 'raw'. It is a large structure, with four masts at 52m rising above adjacent buildings, both in respect of the height of its masts and as the road that it carries is supported on concrete pillars that raise it above the adjacent ground level. Therefore, it has an imposing quality (the bridge's height and width is illustrated on the Context Elevations Plan included

at **Appendix EDP 2**). Its design is primarily related to its function, and it was built to improve the social functionality of the city's transport network.

- 2.18 Given that functionality is the key design influence for the bridge, and that its appearance and presence were secondary considerations, it is considered that, whilst the bridge evidentially has an imposing visual presence and, as a result of its size, is a prominent landmark structure along the River Usk, within Newport's cityscape; the bridge's aesthetic value is not as great a contributor to its significance as its evidential and historical values, which, as described above, are more important. Nevertheless, it still possesses a moderate degree of aesthetic value.

Communal Value

- 2.19 The bridge also possesses a degree of communal value. The structure is located centrally within Newport and is experienced daily by many people who use it to cross the river or who see it as part of the cityscape. The bridge is commemorated within the city as part of its history of urban development. Notably, and as referenced in the NCC email, it is depicted in one of the murals painted by Hans Feibusch within the Civic Centre between 1961 and 1964 (**Image EDP A3.1**). The mural includes depictions of members of the City Corporation, highlighting the associative link between the bridge and the history of the municipal development of the city. The bridge is also depicted in Thomas Rathmell's 1983 painting 'Newport from Christchurch Road' which shows the bridge as an element of a view across the modern city.
- 2.20 With reference to CP, the bridge's communal value is largely symbolic rather than commemorative because it symbolises an architectural response to the modern growth of the city. The city landscape is characterised by the presence of the River Usk and the series of bridges that cross it are important, distinctive and symbolic features of the city and of the experience of the people who live there.
- 2.21 This importance is reflected in the significance of the bridge and the bridge's communal value contributes to the bridge's significance. However, with reference to Cadw's listing description, the bridge is primarily designated because of its design, function and as a feature of the history of civil engineering in Britain. As such, the bridge's communal value does not contribute as highly to its significance as its evidential and historical values, with it possessing a moderate degree of communal value.

Description of the Asset's Setting

- 2.22 SHAW describes the composition of a historic asset's setting as:
- Its current surroundings;
 - Our present understanding and appreciation of the historic asset; and
 - What (if anything) survives of its historic surroundings.
- 2.23 In general, the bridge's surroundings comprise the River Usk, the road carried across it by the bridge, the approaches and the surrounding cityscape that is characterised by dense,

urban built development. Of particular relevance is the riverside, which lies adjacent to the bridge, which is occupied mainly by large modern buildings and is lined by walking routes.

- 2.24 In the immediate vicinity of the bridge, the river is broad at c.150m wide. Its banks are composed of mud with various remnants of former jetties or other wooden structures and with scrub vegetation and low trees at the top of the bank, particularly on the eastern side which is less managed.
- 2.25 On the eastern side of the river, a series of roads and walkways run along the riverside adjacent to the bridge (**Images EDP A3.2 – A3.7**), which otherwise is lined by modern buildings, some of which are very recent, notably the six-storey 'Bankside House' and five-storey 'Tramway House', blocks of residential flats, located adjacent to the bridge to the north-west (Bankside House being 11.8m at its closest point), built in the 2020s. To the south and east buildings are mainly of a residential character, with some light industrial structures further to the north-east.
- 2.26 To the immediate south is the site, which comprises an enclosed area characterised by hardstanding colonised by scrub vegetation and strewn with waste materials, that is also used for storage. Adjacent to the site and beneath the bridge (protruding to either side), is a car park also constructed in recent years. It is notable that the disused spaces around the site and the car park under the bridge are a focus for anti-social behaviour.
- 2.27 The western riverside (**Image EDP A3.5**), adjacent to the bridge is characterised by large modern buildings and their associated landscaped grounds, rather than residential development. Most notable is the seven-storey Newport Student Village building located adjacent to the bridge to the south-west. Also prominent in the bridge's surroundings is the three-storey Castle Bingo to the north. Both of these large buildings are situated within areas of modern landscaping, comprising car parks and modern amenity planting. As with the western riverside, the edge of the river is defined by a walking route.
- 2.28 Further west, the dense urban cityscape around the bridge and the elevated roadway that approaches it are also characterised by large municipal buildings and their associated car parks and landscaped spaces, as well as other major roads within the city.
- 2.29 It is notable that the modern development of the river front and spaces around it has resulted in the bridge's surroundings changing considerably from their appearance when the bridge was built, with older buildings removed. However, remnants of the older cityscape are still present in close proximity to the bridge. As described in the Archaeological and Heritage Assessment, rows of terraced houses predominantly of the early 20th century (i.e. Cyril Street, Moris Street, Coverack Road, Witham Street, Feering Street) are located adjacent to the bridge's eastern approach, whereby a row of the houses was removed to accommodate the structure.
- 2.30 Also, on the west side of the river, older buildings are located on George Street (which gave the bridge its name). A comparison between the modern view (**Image EDP A3.10**) and a historic photograph taken during the bridge's construction (**Image EDP A3.11**) demonstrates that some of these buildings are still present but also that some have been removed and that modern buildings are now a feature of the scene.

- 2.31 Another comparison (**Images EDP A3.12** and **A3.13**) shows clearly how the cityscape adjacent to the western side of the bridge has been subject to considerable modern development that has changed its appearance, with the introduction of several tall modern buildings in the background and modern light industrial buildings becoming a dominant feature of the foreground.
- 2.32 Regarding the experience and appreciation of the bridge in the landscape, it has been described in the Archaeological and Heritage Assessment how the bridge, on account of its size, is a highly visible feature of the urban landscape in Newport. It is also explained how the best visual appreciation of the bridge is achieved from the adjacent riverside walkways (e.g. **Image EDP A3.7**) where the bridge is experienced within the context of its function – as a feat of engineering designed to span the River Usk.
- 2.33 It is also explained how, elsewhere, away from the open expanse of the river and its riverside areas, the experience of the bridge is restricted to glimpsed views of its higher parts between or above buildings, and that it is not generally possible to achieve a more complete view of the bridge.
- 2.34 The NCC email states that the view of the bridge from Coverack Road (**Image EDP A3.9**), which is of particular relevance because it includes the site, is a location from where the bridge's *“mass and sweeping form can be particularly appreciated from ground level at relatively close quarters”*.
- 2.35 The email also states that *“We acknowledge that other views of the bridge are available but none offer the same panorama of the bridge as this view. We see this as a valuable view of the Bridge not replicated anywhere else in the City”*.
- 2.36 It is acknowledged that the view from Coverack Road does allow for a view along much of the southern side of the bridge, including part of the elevated roadway that approaches it from the east, albeit with modern fencing in the foreground. The contribution of this view and the spaces in this location to the significance of the asset is discussed further below. However, it is not the case that this view represents the only panoramic view of the bridge that is available in the city.
- 2.37 A panoramic view of the bridge can be seen from the space to the immediate south of the Castle Bingo building on the western side of the river (**Images EDP A3.14** and **A3.15**). This view allows for an appreciation of the full extent of the north side of the bridge and of the elevated roadway leading up to it. Furthermore, it allows a view of the bridge's underside which is not available from Coverack Road due to the adjacent fencing. A similar, although slightly less panoramic view of the bridge, due to its proximity to it, can be achieved from the space to the south of the bridge (**Image EDP A3.16**).
- 2.38 Both of these views allow for an appreciation of the bridge and its architecture to its full extent, such that it can be understood that the bridge is approached via an elevated roadway before it crosses the river. It is hard to see how these views differ, in terms of their facilitation of an appreciation of the bridge, from that achieved from Coverack Road. As such, it is clear that other panoramic views of the bridge are available in the city, contrary to the opinion of NCC.

The Contribution to the Asset's Significance made by its Setting, including that made by the Site

- 2.39 SHAW asks for Stage 2 to identify the “*key factors relating to setting which contribute to the significance of each historic asset*”. It has been established above that a large proportion of the bridge’s significance is on account of its historical value. This element of its significance is not dependent on an experience of the asset within its surroundings and CP states that “*historical values are not so easily diminished by change as evidential values and are harmed only to the extent that adaptation has obliterated them or concealed them*”. As such, short of obscuring or removing the bridge in its entirety, this aspect cannot be diminished by change within the asset’s setting.
- 2.40 Likewise, a proportion of its communal value is also related to its history, and its depiction on murals or artwork, or its relevance to the past lived experience of people in the city, would also be unaffected by change within its setting.
- 2.41 In this regard, the experience of the asset from its surroundings would only contribute to its significance in that they would allow for an experience of:
- The bridge’s structure, such that its design, cable-stayed cantilever construction and function can be seen and understood;
 - The bridge’s aesthetic value, such that its imposing height and concrete materiality can be experienced; and
 - Its role as a ‘landmark’ structure that characterises modern Newport, that can be experienced by people using it or moving around it.
- 2.42 As such, whilst elements of its setting do contribute to its significance, they can only ever contribute to part of its significance and even then, the loss of significance due to change within its setting would only ever affect that contribution, with no loss resulting from the actual loss of the bridge’s fabric itself.
- 2.43 As discussed in the Archaeological and Heritage Assessment, the experience of the bridge from the riverside walks to the north, north-west and south-west (e.g. **Images EDP A3.4, A3.6 and A3.7**) generally allows for a good clear view of at least its main span, its mast and cables and at least parts of its elevated approach road. Given that the bridge was primarily designed and built for a functional purpose (i.e. spanning the river), such views allow for a clear appreciation of the bridge’s cable-stayed cantilever construction in action, spanning the river that it was designed to cross, and allow for an appreciation of its imposing presence. As such, these views, and the riverside walkways from where they are achieved, contribute positively to the significance of the bridge to a moderate degree.
- 2.44 Modern buildings are present in these, and other, views, either forming part of the foreground or sitting adjacent to the bridge at the riverside. Whilst the buildings contrast in appearance with the bridge’s stark concrete architecture, none of them are of sufficient scale or height to compete with the bridge or do more than screen views to very limited parts of its structure. In all riverside views, the modern buildings still allow for the bridge’s cable-stayed cantilever construction to be experienced, and its function ascertained and, for it to represent the most prominent and imposing structure in the scene. As such, the

presence of these modern buildings does not reduce the degree to which these views (and the riverside locations from where they are achieved) contribute to the asset's significance.

- 2.45 The views from both Coverack Road, and from adjacent to the bridge at its western end next to Castle Bingo, also allow a good appreciation of the bridge. From both locations the views do not illustrate the bridge's function in the same way as from the riverside as, although the structure is evidently a bridge, it is not seen crossing the river and so this aspect of its functionality is not as explicit. However, they do both allow for an appreciation of the bridge's engineering, imposing size and concrete construction, and in terms of its function, of the elevated roadway that approaches the part of the bridge that spans the river.
- 2.46 However, the views of the bridge from Coverack Road (**Image EDP A3.9**) are obscured slightly by the scrub vegetation that lines the top of the riverside and by the fencing around the site, and the dumped materials and overgrown vegetation within it, which sit in front of the bridge. As stated in the Archaeological and Heritage Assessment, this space and its fencing is unattractive and creates a 'gap' in the built urban landscape, whereby there are buildings beyond the space and adjacent road to the south and east.
- 2.47 This disused 'gap' is notable in views from the bridge (**Image EDP A3.8**) and from the opposite side of the river (**Image EDP A3.4**) where the space breaks up the visual continuity between the residential buildings to the north and those to the south.
- 2.48 As such, whilst (in contrast to the Archaeological and Heritage Assessment) it is considered by the author of this Note that the view of the bridge achieved from Coverack Road, for the reasons set out above, does represent a positive aspect of the bridge's setting that contributes to a low degree to its significance, this positivity is greatly diminished by the presence of the site in the foreground which itself represents a negative aspect of the bridge's setting that detracts from its significance to a low degree.
- 2.49 In contrast, the view from adjacent to the Castle Bingo building also allows for a similar broad appreciation of the bridge, with the foreground comprising a modern landscaped area populated by lamp posts and a few small trees. This functional and landscaped part of the city reflects the urban character of the bridge, forming an appropriate foreground to the structure, and is considered neutral in this regard. As such, this view also makes a low positive contribution to the bridge's significance that is undiminished.
- 2.50 SHAW puts some emphasis on understanding how an asset's setting has changed since it was first built and whether that has resulted in a loss of significance or change in the asset's function. As discussed above, the cityscape around the bridge has changed considerably with a great prevalence of mainly 21st century buildings in many of the views that include the bridge.
- 2.51 Glimpsed views of the bridge are available from many places in the city; however, as noted in the Archaeological and Heritage Assessment, such views generally only provide for a partial experience of the bridge and, whilst these glimpses reflect an appreciation of the bridge's presence as a part of the cityscape, that relates to its communal value, the locations from where they are obtained do not themselves allow for any particularly profound experience of the asset, its prominence or function, or relate to its significance in other ways (such as by having an association with its history).

- 2.52 The bridge is also experienced on the approaches towards it from the east and west. These experiences of the bridge are directly related to its function, such that the bridge is approached as if to be crossed and the structure is experienced stretched out ahead (i.e. **Image EDP A3.12**). As discussed above, some of these views are recorded in historic photographs but where only some elements of the street scene (such as from George Street) reflect buildings that were present when the bridge was constructed.
- 2.53 As described, the cityscape around the bridge in views from both directions has changed considerably and become populated by numerous large modern buildings. However, the historic function of the bridge has not changed, and it was built with an intention to form part of a modern urban landscape. As such, because none of the modern buildings in these views compete with an appreciation of the bridge's imposing architecture, or obscure its function, their presence does not reduce an ability to understand its significance and they simply form elements of the surrounding modern urban environment, being neutral in respect of the bridge's significance.
- 2.54 Part of the experience of using the bridge involves views from its elevated structure. Due its height, such views (**Image EDP A3.8**) mainly take in adjacent taller buildings in the locality or provide more distant views across the city. The bridge was not built to provide views, its elevated height is related to its function in carrying the road across adjacent streets and over the river.
- 2.55 As with views to the bridge, the presence of modern buildings adjacent in the view is not out of character from the bridge's intended urban setting and none of the buildings are tall enough to compete with the height of the masts, which remain the most imposing and prominent elements in the street scene. As such, none of the views to adjacent modern buildings result in a negative effect on the asset's significance.
- 2.56 It is notable that the site can be seen from the edge of the bridge (**Image EDP A3.8**). As described above, the site represents a disused, fenced area characterised by dumped and stored materials and overgrown vegetation. It is marked out by its high modern fence and its surroundings are a focus for anti-social behaviour. In such views the site represents an unkempt 'gap' in the urban landscape and, again, in such views its appearance in the setting of the bridge is as an unattractive space that is a negative element of the bridge's setting.

Summary

- 2.57 As a summary of the above, the following statements apply when understanding how the present surroundings of the George Street Bridge contribute to an appreciation and understanding of the historic asset:
- The experience of the asset from its surroundings can only contribute to some of the factors that make up the totality of its heritage significance;
 - The bridge is partially visible from many locations in the city on account of its size, but broad, clear views are only available from certain locations;

- The experience of the bridge from the riverside walks on all sides of it allow for a clear appreciation of the bridge's engineering, function and imposing prominence and therefore contribute positively to the significance of the bridge to a moderate degree;
- Modern buildings are a feature of many of the views that include the bridge, including on the approaches to it, but these are of insufficient scale or height to compete with the bridge or do more than screen views to very limited parts of its structure. Although the bridge's historic setting has changed considerably, given that the bridge was designed to form a part of an urban cityscape, modern development in its surroundings forms a neutral element of its setting;
- Extensive views of the bridge can be achieved from Coverack Road and from the spaces adjacent to the bridge on the western side of the river. These all allow for a positive appreciation of the bridge's significance, and make a low contribution to its significance but, those from Coverack Road also include the site which represents a negative feature of the asset's setting which detracts from the quality of this view; and
- The site is experienced both in views to the bridge from Coverack Road and from across the river and, in views from the bridge where, on account of it forming a 'gap' in the urban landscape and due to its unattractive appearance, it represents a negative element of the bridge's setting that detracts from its significance to a low degree.

Stage 3: Evaluate the Potential Impact of a Proposed Change or Development on that Significance

- 2.58 The proposed development would result in a five-storey block of 40 flats being located in the site, facing to the west, with a frontage onto the riverside roadway. The building would be finished in modern materials and would adopt a similar appearance to the blocks located to the north of the bridge.
- 2.59 The eastern side of the site (the rear of the building) would be occupied by car parking spaces, bicycle storage and bin stores. The proposal would include trees, vegetation and a pavement along Coverack Road to the south. A heritage information board is proposed on the south-west corner of the site with a view towards the bridge.
- 2.60 The development of the site would result in it ceasing to represent a disused, unattractive space and the occupation of the site for residential use would reduce the likelihood for anti-social behaviour in its vicinity. This change would remove a space from views to and from the bridge, and thus from its setting, that presently makes a negative contribution to its significance.
- 2.61 The proposed building and its associated landscaping features and vegetation would become a feature in many of the views in which the bridge is experienced that have been discussed above.
- 2.62 In views along the riverside walk from the north (**Image EDP A3.7**), the building would be seen, situated behind the bridge's cables to the left. It would be slightly lower in height than the six-storey Bankside House and would be notably lower and of a lesser mass than the Newport Student Village building which sits behind the bridge on the opposite bank. The

proposed building would not screen any part of the bridge and its engineering, function and imposing presence and materials would still be as appreciable as they are at present, and the moderate contribution to the bridge's significance from this view would be retained.

- 2.63 Likewise, in views from the walkways along the west bank of the river, the building would be seen either behind or to the side of the bridge. Again, the building's height and mass would be comparable to the buildings to the north of the bridge and, in the view from the south-west (**Image EDP A3.6**), would only screen a very small part of the bridge.
- 2.64 The size of the proposed building set against the bridge is clearly illustrated in the Context Elevations drawing at **Appendix EDP 2**, which shows how the bridge is considerably larger and how the proposed building's roofline sits only two storeys above the line of the elevated roadway, such that for the most part, in views from the south the building screens only the bridge's concrete support pillars.
- 2.65 Again, with regard to the experience of the bridge's engineering, its function and its prominent and imposing size and concrete materials, all of these aspects would continue to be visible and experienced in such views, from the opposite riverside, following development. As such, its heritage significance would be unaffected.
- 2.66 Notably, from the western riverbank, the building would fill the gap between the existing development to the north of the bridge and the modern houses further to the south. This inclusion would bring further urban development into the bridge's setting and complete the row of buildings along the riverside.
- 2.67 From the south, on the east side of the river, views from the housing development to the south are only partial due to the presence of intervening buildings and riverside vegetation. The experience of the Grade II* listed bridge opens up from the bottom end of Coverack Road (**Image EDP A3.3**).
- 2.68 From along the full extent of Coverack Road, the proposed development would be experienced at close quarters. It would replace the fencing, unkempt vegetation and dumped and stored materials that are in the site and which presently sit in the foreground of the view. This would result in the cessation of the negative influence that the site presently has on the experience of the bridge in this view. The trees, vegetation and pavement proposed along the northern edge of Coverack Road would also be present in the view. These features would add function and use to the roadside which presently has a disused character.
- 2.69 The building would screen a part of the view to the bridge in views along Coverack Road. This screening is illustrated on the visualisations and Massing Drawings located at **Appendix EDP 2**. From the corner of the road to the east (View 1 and **Image EDP A3.17**) the building would obscure the longer view to the bridge's westernmost masts and cables and a small part of the lower extent of the bridge's easternmost masts and cables.
- 2.70 As the observer progresses along Coverack Road to the west, the westernmost extent of the bridge would become more appreciable, although it would still be partially obscured by the vegetation at the top of the riverbank which is not within the site. View 2 and the visualisation **Image EDP A3.18** show the view from the western end of Coverack Road,

where the building would only obscure a view to part of the bridge's cables and part of its elevated roadway further east. From this location, notwithstanding the screening effect of vegetation along the top of the riverbank looking to the west, the majority of the full span of the bridge would still be visible.

- 2.71 Whilst the proposed building would, undoubtedly, screen part of the bridge, at no point in the visual experience, from the various locations on Coverack Road, would the bridge cease to be visible at all, with the majority of it consistently part of the experience. In accordance with SHAW, it is the change made to the contribution made to the significance of a historic asset that is of relevance in understanding how change to setting would affect a historic asset.
- 2.72 In this case, the proposal would change the experience of the asset from its setting on Coverack Road; however, the fundamental qualities of the bridge that are experienced from its setting would still be appreciable even with a part of its screened – it would still be possible to appreciate its engineering and design and understand that it is a working suspension bridge, that is (in accordance with Cadw) the key aspect of its significance and the main reason for its designation, because its masts and cable and supported roadway would in all places still be visible enough to still understand what they are. The bridge would also by far remain the tallest and most dominant structure in the locality, with its concrete masts rising above the proposed building in all views.
- 2.73 This aspect of the aesthetic value of its architecture – its imposing size, mass, materials and simplicity that define its Brutalist style would still be possible to experience, the five-storey height of the building would not be such that the bridge would lose any aspect of its physical dominance. Additionally, given that most of the structure across this particular viewscape would still be entirely visible, the bridge would still be easily recognisable as the landmark that it is within the city and would retain its quality as a highly noticeable element of the lived experience of people using the space.
- 2.74 As noted previously, the NCC email notes how the change in the extent of the bridge that is visible would result in the loss of the only area where a panoramic view of the bridge is possible. This is not the case; in the equally panoramic and better-quality view from adjacent to the Castle Bingo building (**Image EDP A3.14**), the proposed building would be present only as a feature of the backdrop to the bridge in the middle distance.
- 2.75 It would not screen any part of the bridge, and it would sit behind it against a backdrop of further urban modern development. Similarly, the panoramic view from the south side of the bridge (**Image EDP A3.16**), on the western bank would also be retained. Neither of these panoramic views, where the bridge's 'mass and sweeping form' can be appreciated from ground level at relatively close quarters, would be curtailed.
- 2.76 Consequently, the loss of any extent of view from the change to the experience of the bridge on Coverack Road would not result in the loss of the only point from where a panoramic view of the bridge can be obtained. Indeed, the redevelopment of the site would in fact remove a negative element from that view, which should be given as much credence as any perceived impact from the imposition of the proposed building.

- 2.77 In the view from the bridge itself, the presence of the proposed building would only be to two storeys above the height of the walkway. The presence of the negative features that currently characterise the site in such views would be gone and, whilst the building would be only 8.1m from the edge of the walkway, its presence would not screen any view from the bridge that is of relevance to its significance. As such, the experience of the bridge's structure, function and its imposing presence whilst traversing it would be unaffected by the presence of the proposed building.
- 2.78 In conclusion, it is assessed that the proposed development would result in change within the setting of the George Street Bridge, such that a disused area characterised by unattractive fencing, overgrown vegetation and dumped and stored materials that, through its disuse, attracts anti-social behaviour in the spaces around it, would cease to exist and, would therefore cease to have a low negative influence on the significance of the bridge.
- 2.79 The proposed development that replaces it would change the way that the bridge is experienced from some locations, however as a modern building of five storeys, its appearance would suit the character of modern riverside development that has occurred on both sides of the river, and which is appropriate for the bridge's setting, which was evidently designed to form part of an urban landscape. Furthermore, where its screens parts of the bridge in views, it never does so to such an extent that the elements of the bridge's significance that can be experienced from its setting are entirely obscured or, that the bridge loses any aspects of its dominant and imposing presence. It also does not result in the loss of any type of visual experience of the bridge that cannot be experienced elsewhere in the cityscape.
- 2.80 Thus, following development, the bridge would continue to be appreciable from its surroundings for its innovative civil engineering: its cable-stayed cantilever construction and how this supports its function, its aesthetic value as a large and imposing concrete structure and its landmark status within the city would still be appreciable. As such, it is the author's opinion that, in accordance with the Archaeological and Heritage Assessment, the proposed development would not result in any loss of significance from the Grade II* listed bridge.
- 2.81 It is appreciated that it is NCC's opinion that the proposals would result in an adverse impact on the significance of the bridge from change within its setting. This is expressed in the email as a 'substantially adverse impact'. For the reasons outlined in this assessment, it is our opinion that this would not occur. However, if it is deemed to be the case that the change to the view from Coverack Road or any other change to the setting of the bridge would result in an adverse impact on the bridge's significance, it is our position that this could only even result in a very low level of loss.
- 2.82 As set out above, only a proportion of the asset's total significance can receive a contribution from its setting and therefore, the asset's setting can only ever contribute to its significance to a limited degree. In the present case, for the most part, experiences of the bridge from numerous different locations in the city would be entirely unaffected by the proposed development.
- 2.83 Most notably, as explained above, it would continue to be seen and experienced as it is now in the views to it along the riverside, and in panoramic views that are equivalent to those on Coverack Road, but from the western side of the river. As explained above, the presence of

the proposed development in these views would not result in the bridge being heavily obscured or its presence being diminished. Furthermore, its tall masts would continue to feature in various glimpsed views from around the city that reflect its quality as a well-known local landmark, and which thus reflect its communal value.

- 2.84 In this regard, even if the loss of one part of the view to the bridge in views from Coverack Road is deemed to be harmful to its significance, this screening is only partial and from only one location in which the bridge is experienced, whereby that experience contributes to its significance. As such, it is contended that a perceived impact could not possibly be 'substantially adverse' and would instead have to be at a very low level.
- 2.85 In addition, the proposed development will now include a heritage information board, which will be situated at the corner of Coverack Road such that a view of the bridge will be appreciable whilst the board is read. It is intended that the board will present a set of information on the bridge and its history. This provision is not made anywhere else within the local area and would complement the wider depictions and information on the bridge (such as within the Civic Centre) that reflect the bridge's communal value.
- 2.86 Whilst SHAW states at Section 5 that compensatory proposals such as increased public access or interpretation panels will not reduce or mitigate the impact of development within the setting of a historic asset, it is advised that proposals for offsetting should be presented, so as the decision-making authority can weigh the benefits of the scheme. In this regard the provision of interpretive material would provide an additional minor benefit to the significance of the bridge, in furthering the availability of information on it within the public realm.

3 CONCLUSION

- 3.1 This Heritage Technical note presents a conclusion that supports the Archaeological and Heritage Assessment in that it assesses that the proposed development would be within the setting of the Grade II* listed building George Street Bridge but that it would represent a neutral element of its setting that would not result in any adverse loss of its significance.
- 3.2 Furthermore, it is concluded that the development of the site would result in the loss of an area that presently represents a negative element of the setting of the bridge, which detracts from its significance to a low degree. It also concludes that the provision of a heritage information board would further aid the interpretation of the asset to the public and would result in an additional minor benefit to the significance of the bridge.
- 3.3 The assessment set out in the Note accords well with the Inspector's conclusions regarding the dismissed appeal of April 2015 (APP/G6935/A/14/2229585) which is described in the Archaeological and Heritage Assessment. In terms of defining how the asset's significance is appreciated in views, it is agreed with the Inspector that:

"...the bridge's engineering excellence and qualities are appreciated through its setting with a visual prominence largely attributed to its elevation over a wide span of open water and its clear definition as a cable stayed bridge with its supporting vertical masts rising high above the surroundings."

- 3.4 Notably the Inspector also concludes that, whilst the 14-storey building that was proposed was deemed unacceptable due to its height and form in relation to that of the bridge mast, the five- and seven-storey elements of the proposal were not deemed to be such that they would cause 'harm to the asset's setting'.
- 3.5 It is also noteworthy that in 2018 the six-storey Bankside House building, which is only located c.3m further from the bridge than the current proposal, was also deemed acceptable, with the NCC Heritage Officer concluding that the development would preserve the bridge's setting and the planning committee concluding that the six-storey scale of the building would *"respect the setting of the bridge and its surroundings"* and commenting more generally that:
- "The Riverfront is fast developing into a modern and contemporary feature of the City which is promoted by urban regeneration aspirations. It is considered that the siting of modern buildings adjacent to the bridge on the west bank of the river has not detracted from the setting or presence of the bridge as a listed structure and as a well-known feature of central Newport. The proposed development is considered to be an improvement compared to the current poor-quality buildings."*
- 3.6 Given these previous judgements and decisions, it is considered that a development of lower height and of similar style, such as that proposed to the north, should therefore be treated in a similar manner and that it should be acknowledged that the proposed development would not result in an unacceptable change to the setting of the Grade II* listed bridge. The George Street Bridge would demonstrably retain its significance should the development go ahead.

Appendix EDP 1 NCC Email

From: [Roberts, Geraint \(Principal Planning Officer\)](#)
To: [Rob Skinner](#); [Smith, Laura \(Principal Heritage Officer\)](#); [Davidson, Joanne \(East Area Development Manager\)](#)
Cc: [Ulinos Hallett \(Ulinos@asbriplanning.co.uk\)](mailto:Ulinos.Hallett@asbriplanning.co.uk)
Subject: P/24/0058 - Coverack Road. Newport - Phase 2
Date: 28 November 2024 16:36:13
Attachments: [image001.png](#)
[image006.png](#)
[image007.png](#)

Dear Mr Skinner

Thank you for providing the massing study further illustrating the relationship between the proposed 5 storey block of flats at Coverack Road and the George Street Bridge (LB 25847).

You will remember that the Council had expressed concerns over the massing of the proposal and its impact on views of the Bridge particularly from Coverack Road which offers a view of the bridge where its mass and sweeping form can be particularly appreciated from ground level at relatively close quarters.

We acknowledge that other views of the bridge are available but none offer the same panorama of the bridge as this view. We see this as a valuable view of the Bridge not replicated anywhere else in the City.

CADW's Conservation Principles identify the elements that contribute to significance and these include aesthetic & communal value. The Council concludes the Bridge has both of these and notes the links to the Feibusch murals at the Civic Centre where the bridge construction is featured.

We would expect any submission to clearly assess the significance of the Bridge and the impact of the proposal upon its setting; see:

Conservation Principles [Conservation Principles Doc ENG](#), and

Setting of Historic Assets in Wales [Setting of Historic Assets in Wales EN.pdf](#)

We do not agree that the impact on the setting of the Bridge is of 'no effect' on the evidence provided; in fact much the opposite and we struggle to understand how this conclusion was arrived at.

Hence the need for a very thorough and robust justification for the conclusions arrived at under the methodologies set out in the above documents. These conclusions and their justifications would be a necessary part of any submission we might receive and it does not follow that we would straightforwardly accept any conclusions arrived at unless very well made out indeed.

We continue to conclude that the proposal would have a substantially adverse impact on the setting of the listed Bridge and our concerns are not allayed by the additional information, in fact they are reinforced.

Geraint N. Roberts

Prif Swyddog Cynllunio / Principal Planning Officer
Tîm yr Dwyrain / East Team
Adfywio a Datblygu Economaidd / Regeneration and Economic Development
Cyngor Dinas Casnewydd / Newport City Council
01633 210094

(If I am unable to take a phone call from you please contact me by return of email. I will aim to respond to all email enquiries by email unless alternative arrangements such as a call via Microsoft Teams is mutually agreed).

From: Rob Skinner <rob.skinner@edp-uk.co.uk>

Sent: 25 November 2024 09:50

To: Smith, Laura (Principal Heritage Officer) <Laura.Smith@newport.gov.uk>

Cc: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>; Llinos Hallett (llinos@asbriplanning.co.uk) <llinos@asbriplanning.co.uk>; Ceri Griffiths <ceri@kjb.uk.com>; Josh Guy <Josh.Guy@newportcityhomes.com>; George Milburn (george@asbriplanning.co.uk) <george@asbriplanning.co.uk>

Subject: edp8348 - Coverack Road - Phase 2

Dear Laura,

As discussed at our meeting on the 23rd October, please find attached a series of images that present a massing comparison between two different development locations and two different heights (3 and 5 storey) in views from Coverack Road towards the Grade II* listed George Street Bridge plus a photorealistic version of one of the views.

With reference to the assessment presented in Section 5 of the Archaeological and Heritage Assessment (edp8348_r001c), which considered the 5-storey scheme in Location 1, the images support the statement made in the assessment that:

'The five-storey height of the flat block would not compete with the height, scale or prominence of the bridge itself with its concrete masts or cables'.

In this respect the images show that in both of the views that have been replicated, the George Street Bridge remains prominent behind and adjacent to the proposed five-storey building with its concrete masts and cables easily experienced and appreciated due to their height and much greater scale than the development. In both views the bridge would still be appreciable and the limited screening created by the proposed building would not be enough to diminish the presence of the bridge or negate an ability to experience and appreciate the imposing prominence, that is an aspect of its significance, from within its setting on Coverack Road and the River Walk. In this regard, we feel that these visualisations support the conclusions of the assessment that:

'...the introduction of built form of a lower height and similar modern and sympathetic design to existing residential development adjacent to the bridge within the Site, would not result in an adverse change to the setting of the asset. Therefore, the Proposed Development would have no effect on the asset's heritage significance.'

The images also demonstrate two other factors, that are also stated in the notes that accompany them:

- That the original configuration (as represented by location 2) would result in a greater degree of obstruction of the bridge in views from Coverack Road than the revised, preferred location (location 1) and therefore the preferred scheme has greater respect for the prominence of the listed bridge in this particular view, and
- That a three storey building, whilst it would screen less of the bridge in views from Coverack Road, would not notably reveal the bridge to any degree that is much greater than for a five storey building, such that, as stated above, the five storey option would still allow for a good appreciation of the bridge behind and adjacent to it on account of the difference in scale. As such, there is no great benefit to the experience of the bridge in considering an option of lower height.

This second point is demonstrated by the image below which shows the extent of the additional space that would be screened by a five-storey building. It is clear that this represents only a small proportion of the visible extent of the bridge from Coverack Road and still allows for the majority of the structure to be seen and for the asset to retain its important prominence in these views.



We look forward to your response on this matter and are looking to progress to PAC promptly from the 1st December. As such, we would greatly appreciate any comments on the visualisations and how they relate to the heritage assessment by the 30th November if possible please.

Kind regards,

Rob

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<http://www.canit.akauk.net/>

Rob Skinner (*he/him*) BA (Hons), MA, MCIfA

Associate



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The Council welcomes correspondence in English or Welsh or both, and will respond to you according to your preference. Corresponding in Welsh will not lead to delay.

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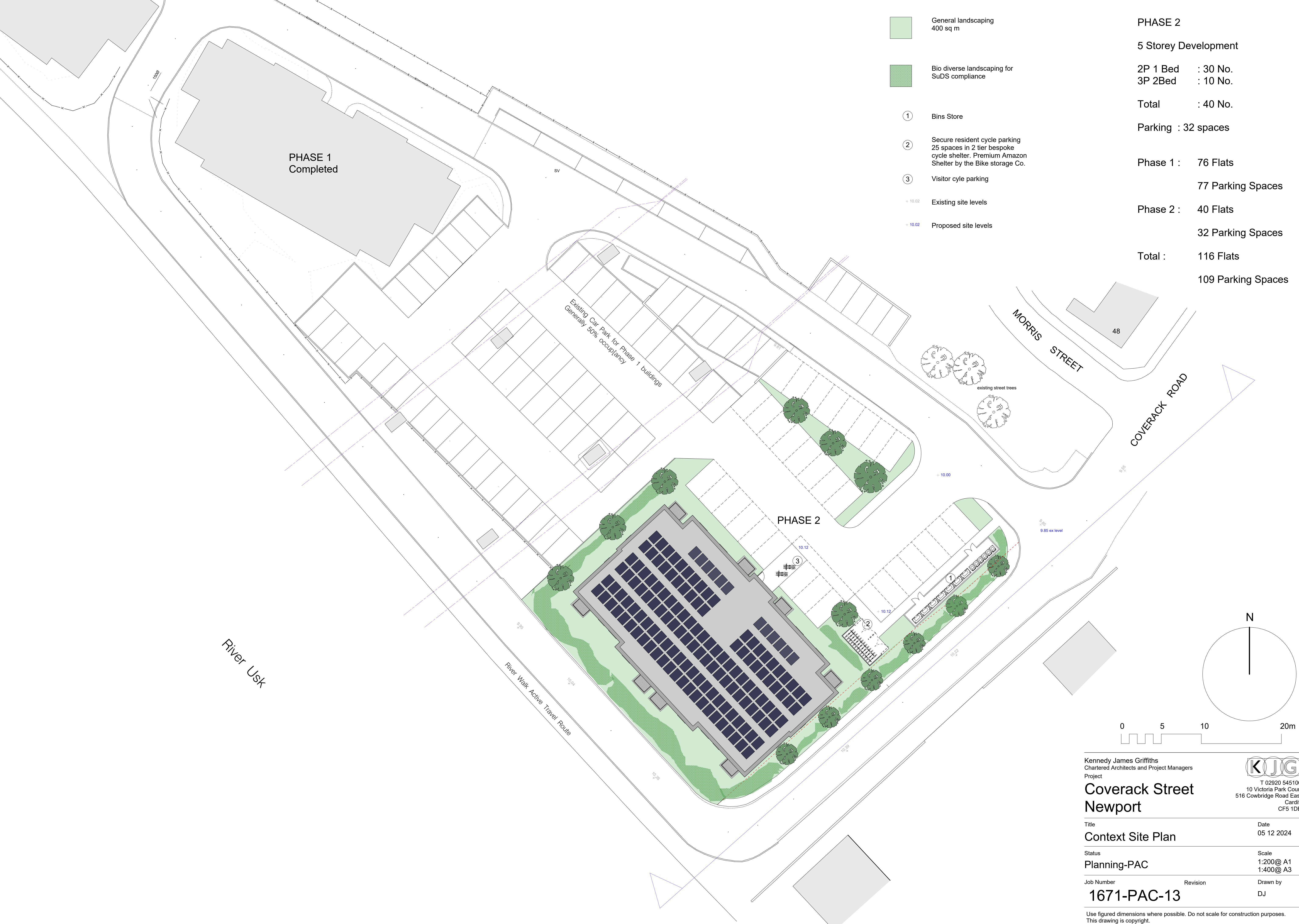
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Pan fyddwch yn anfon e-bost at Gyngor Dinas Casnewydd, rydych yn cydsynio i'r Cyngor fonitro a darllen unrhyw e-byst o'r fath at ddibenion cydymffurfio â diogelwch ac â deddfwriaeth. I weld yr ymwadiad llawn ewch i <http://www.newport.gov.uk/ymwadiad>

Appendix EDP 2 Development Proposals



PHASE 2

5 Storey Development

2P 1 Bed : 30 No.
3P 2Bed : 10 No.

Total : 40 No.

Parking : 32 spaces

Phase 1 : 76 Flats
77 Parking Spaces

Phase 2 : 40 Flats
32 Parking Spaces

Total : 116 Flats
109 Parking Spaces

Kennedy James Griffiths
Chartered Architects and Project Managers
Project

Coverack Street
Newport

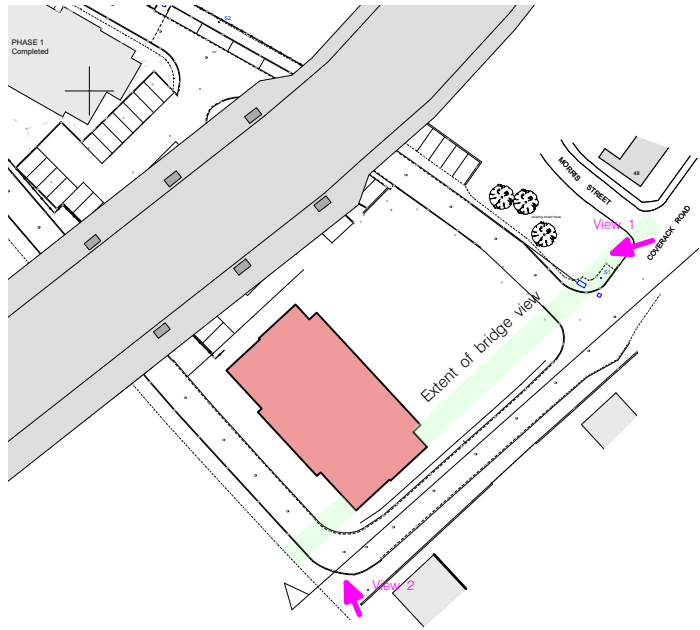
Title Context Site Plan Date 05 12 2024

Status Planning-PAC Scale 1:200@ A1
1:400@ A3

Job Number 1671-PAC-13 Revision Drawn by DJ

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KJG
T 02920 545100
10 Victoria Park Court
516 Cowbridge Road East
Cardiff
CF5 1DB



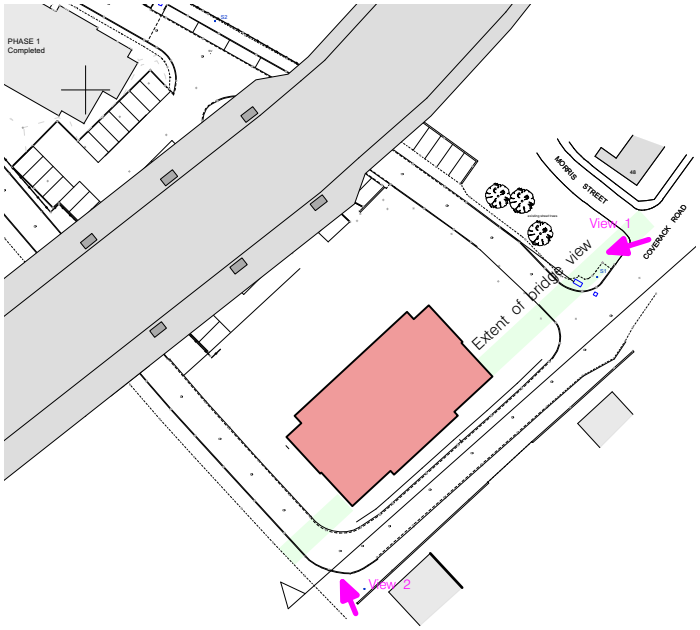
View 1 Location 1 (preferred)



5 Storey as proposed



3 Storey comparison



View 1 Location 2



5 Storey as proposed



3 Storey comparison



View 2 Location 2

Notes:
 Location 1 offers more unrestricted views of the bridge (green areas) and has significantly less impact on the bridge when viewed from both viewpoints. The bridge is clearly visible behind the building and its scale is not diminished by the building, if anything the building enhances the scale of the bridge as it gives a clear reference of size. The bridge remains the most significant, and important part of the view, even with the proposed building in place. The 3 storey option is shown only for information and to demonstrate that a larger (5 storey) building does not have significantly more visual impact on the views of the bridge than the lower building. Location 1 offers the least obstruction of views of the bridge as viewers proceed along Coverack Road to the River walk. Once past the building the view of the bridge opens up and is unrestricted (View 2)

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 Chartered Architects and Project Managers
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**Proposed Apartments
 Coverack Road, Newport**

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 10 Victoria Park Court
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 Cardiff
 CF5 1DB

Title	Date
Massing comparison	10/11/2024
Status	Scale @ A3
Planning Application	NTS
Job Number	Revision
1671-PL-10	Drawn by
	CKG

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River Walk Active Travel Route

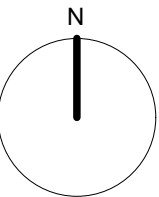
PHASE 2

5 Storey Development

2P 1 Bed : 30 No.
3P 2Bed : 10 No.
Total : 40 No.
Parking : 32 spaces

- General landscaping
400 sq m
- Bio diverse landscaping for
SuDS compliance

- ① Bins Store
- ② Secure resident cycle parking
25 spaces in 2 tier bespoke
cycle shelter. Premium Amazon
Shelter by the Bike storage Co.
- ③ Visitor cycle parking
- + 10.02 Existing site levels
- + 10.02 Proposed site levels



Rev : Date Description

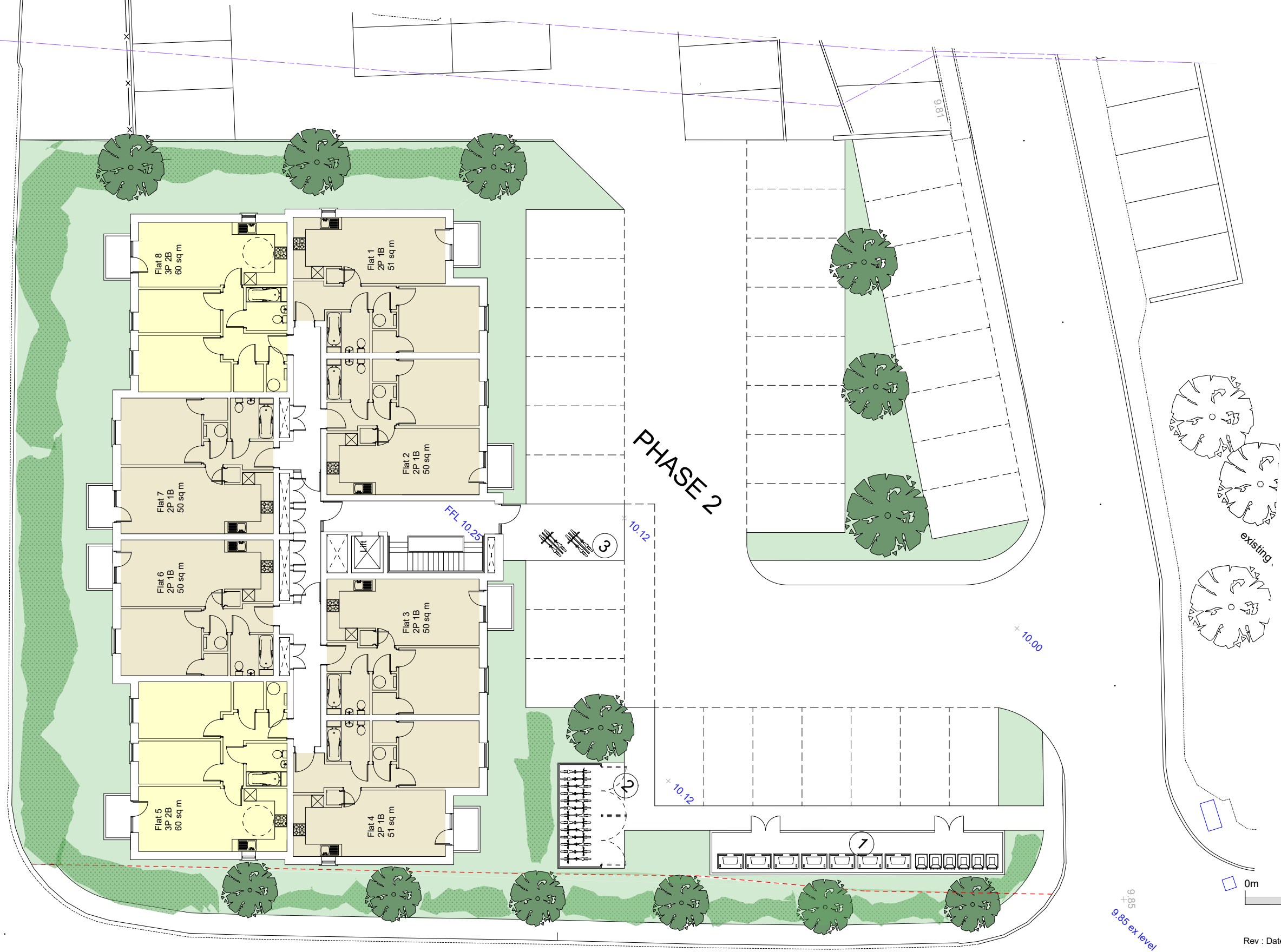
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516 Cowbridge Road East
Cardiff
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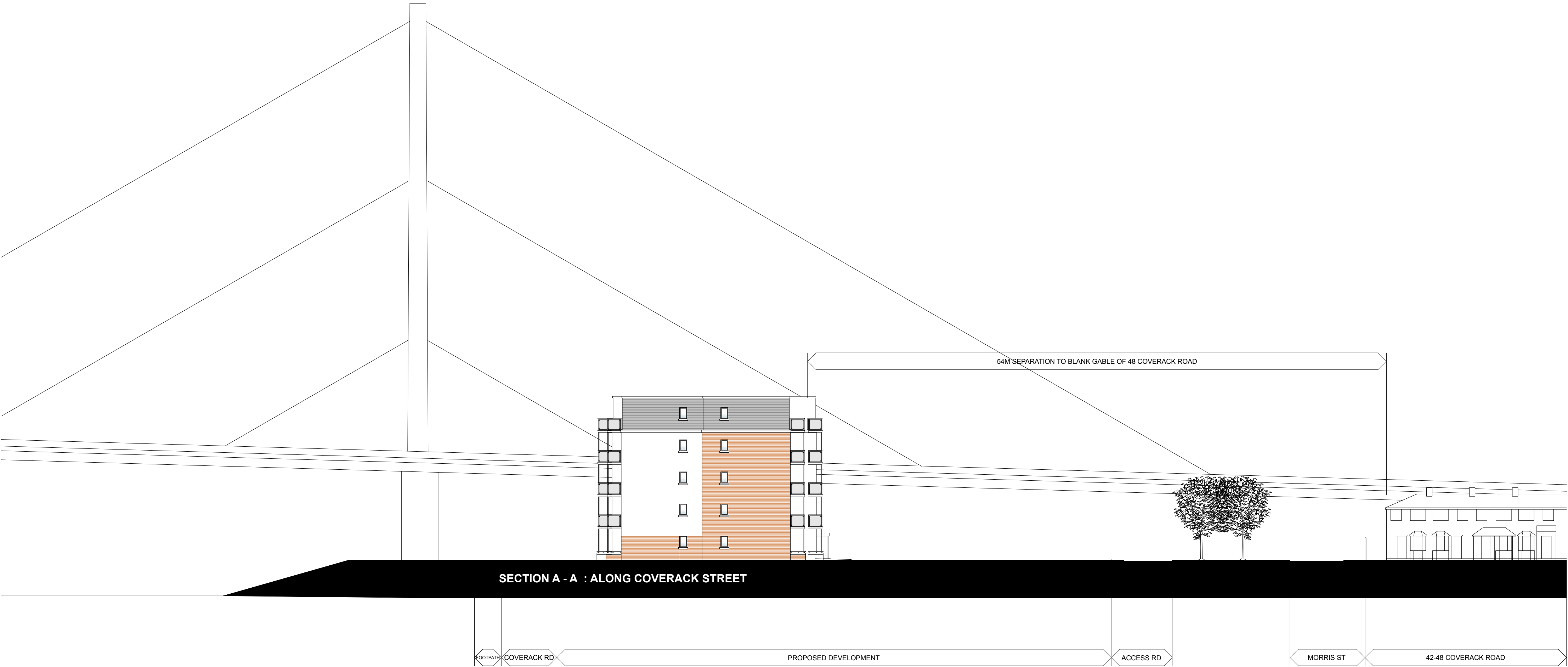
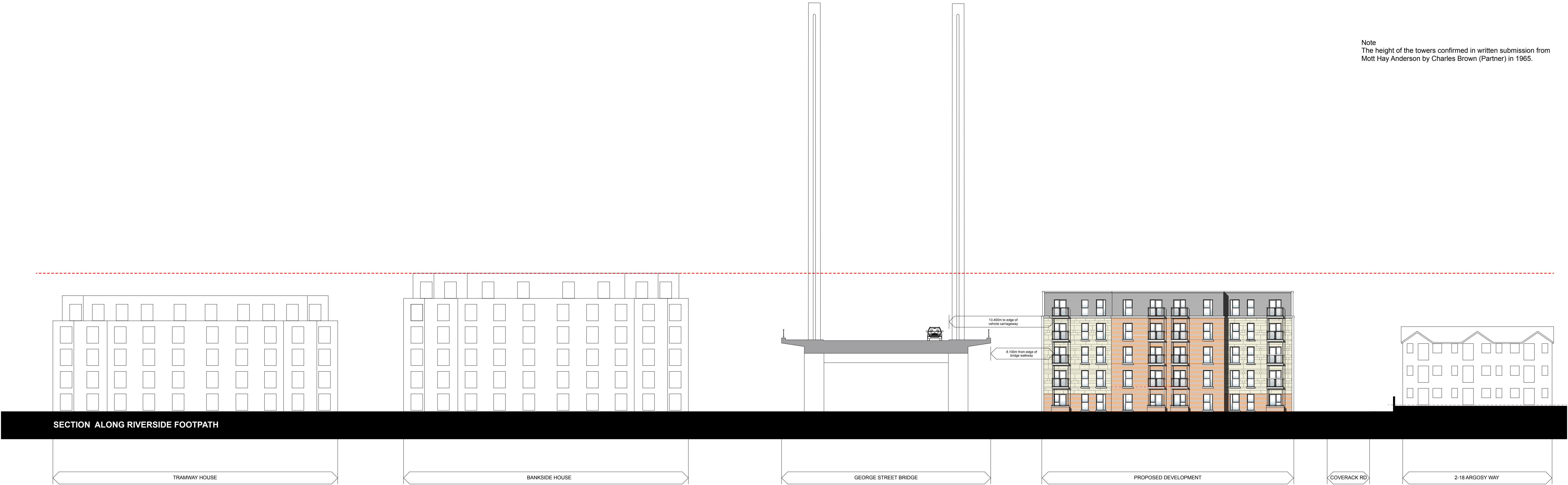
Proposed Apartments
Coverack Road, Newport

Title	Date	
Site Plan Plan	04 12 2024	
Status	Scale @ A3	
Planning- PAC	1:200	
Job Number	Revision	Drawn by
1671-PAC-04		CKG

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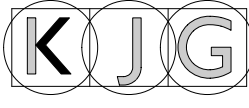
Note
The height of the towers confirmed in written submission from
Mott Hay Anderson by Charles Brown (Partner) in 1965.



C : Bridge added : 31 10 2024
B : Additional context added : 12 09 2024
A : Additional context added : 11 07 2024



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Coverack Road Newport

Title Date
Context Elevations 09 01 2024

Status Scale
Pre Application Consultation 1:250@A1
1:500@A3

Job Number Revision Drawn by
1671-PA-08C DJ

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Appendix EDP 3 Relevant Images



Image EDP A3.1: Image showing the part of the Hans Feibusch mural in the Civic Centre which illustrates the bridge under construction.



Image EDP A3.2: View looking along the eastern riverside illustrating its present character populated by modern residential buildings.



Image EDP A3.3: View looking north to the bridge from the western end of Coverack Road. The disused, derelict land to the right is the site.



Image EDP A3.4: View towards the bridge from the eastern riverside walk. The proposed development would be seen sitting behind the left-hand masts filling part of the present gap.



Image EDP A3.5: View looking south along the western riverside walk, illustrating the University building and Castle Bingo building that are situated adjacent to the bridge in this location.



Image EDP A3.6: View towards the bridge from the riverside walk to the south-west, illustrating how it is experienced in relation to the University building. The proposed development would be to the side of the bridge to the right.



Image EDP A3.7: View towards the bridge from the riverside walk to the north, illustrating the nature of the experience of it. The proposed development would feature on the left to the rear of the cables.



Image EDP A3.8: Image of the view from the bridge across the site, illustrating its disused and derelict character that is a negative aspect of the bridge's setting.



Image EDP A3.9: View towards the bridge from the corner of Coverack Road, illustrating the broad view of the bridge but also the presence of the fencing and vegetation within the disused site in the foreground, and how it detracts from the quality of the experience.



Image EDP A3.10: View towards the bridge from George Street showing how some older buildings are retained.



Image EDP A3.11: Historic photograph looking towards the site from George Street to illustrate how the bridge's setting has changed.



Image EDP A3.12: View towards the bridge on the approach from the west, illustrating the proliferation of modern buildings in the streetscape.



Image EDP A3.13: Historic photograph looking towards the site from the west to illustrate how the bridge's setting has changed.



Image EDP A3.14: View towards the bridge from the car park to the south of Castle Bingo, illustrating the broad view of the bridge that is achieved from this location.



Image EDP A3.15: Panorama of the view in **Image A3.14**, illustrating the full extent of the bridge that is visible in this view.



Image EDP A3.16: View toward the bridge from the space to the south of it on the western side of the river, illustrating the broad extent of the bridge that is visible from this location.



Image EDP A3.17: Visualisation showing a rendered image of the proposed development from the western end of Coverack Road.



Image EDP A3.18: Visualisation showing a rendered image of the proposed development from the eastern corner of Coverack Road.

Plans

Plan EDP 1: Designated Historic Assets
(edp8348_d005c 24 April 2025 JFr/MBa)

Plan EDP 2: HER Records
(edp8348_d001c 24 April 2025 DJo/MBa)

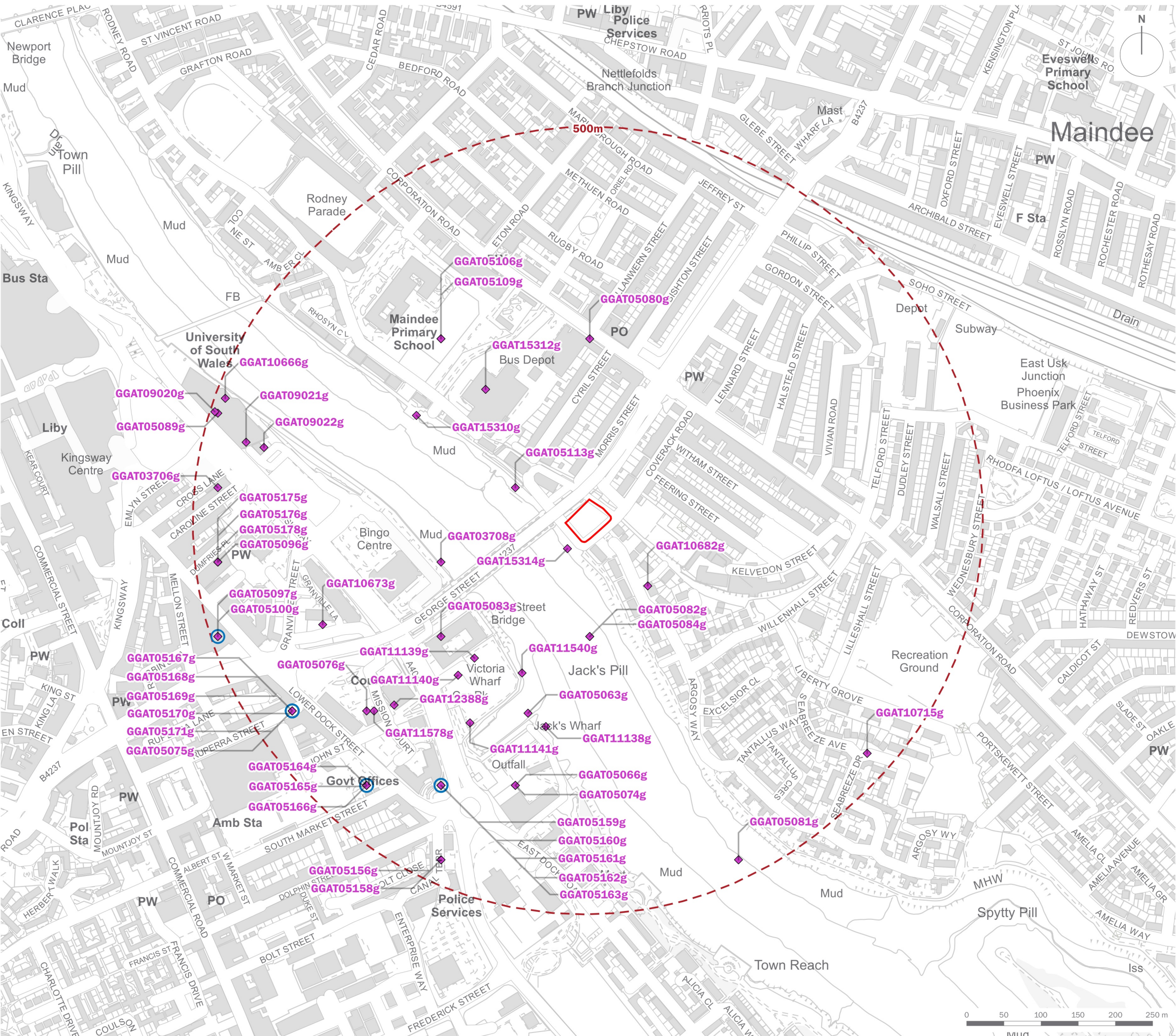
Plan EDP 3: Previous Events
(edp8348_d006c 24 April 2025 JFr/MBa)

Plan EDP 4: Historic Maps
(edp8348_d002c 24 April 2025 DJo/MBa)



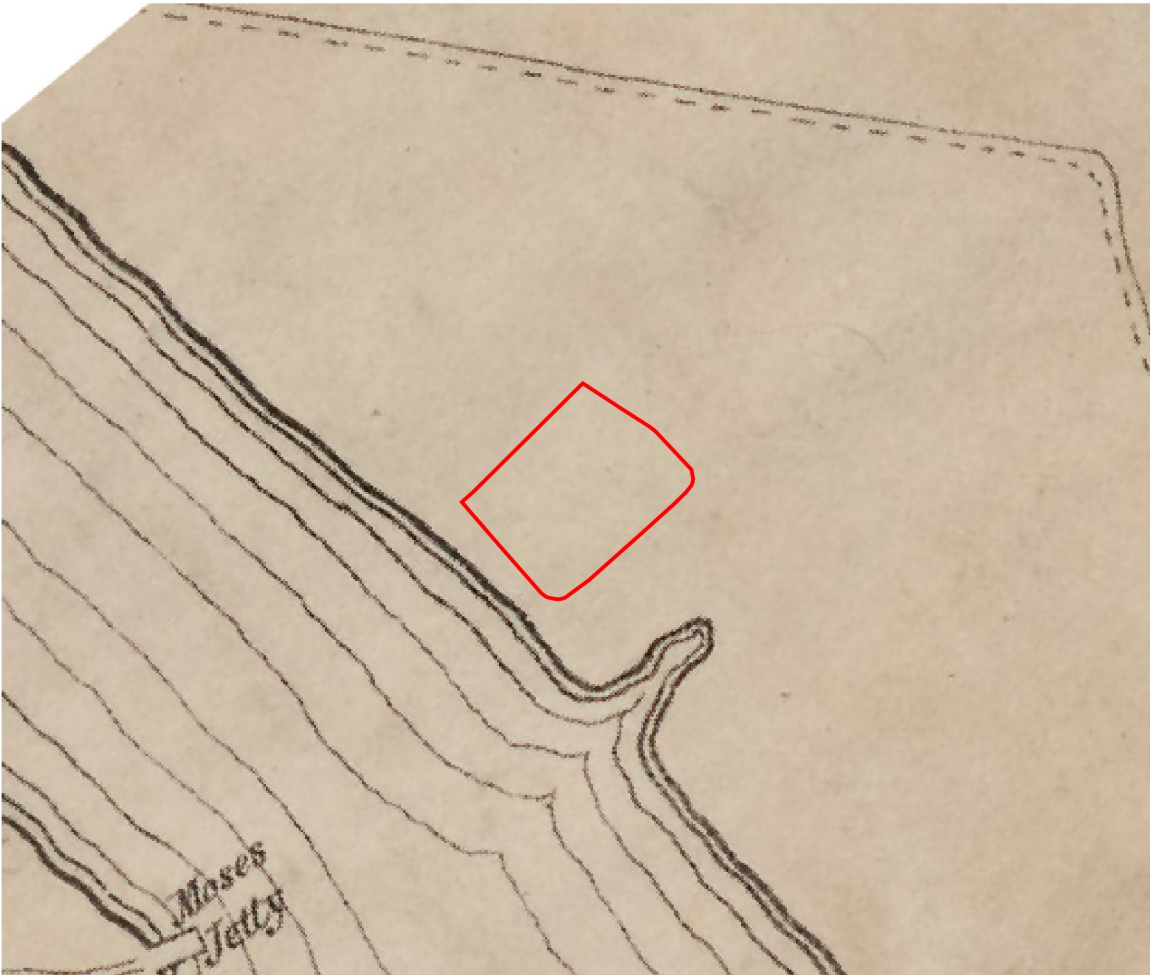
- Site Boundary
- 500m Study Area
- Range Rings (at 1km intervals)
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building
- Conservation Area (CA)
- Registered Park and Garden (RP&G)
- Scheduled Monument

client	Hedyn		
project title	Coverack Road – Phase 2		
drawing title	Designated Historic Assets		
date	24 APRIL 2025	drawn by	JFr
drawing number	edp8348_d005c	checked	MBa
scale	1:15,000 @ A3	QA	GYo



- Site Boundary
- 500m Study Area
- HER Core 2024
- Locally Listed Buildings

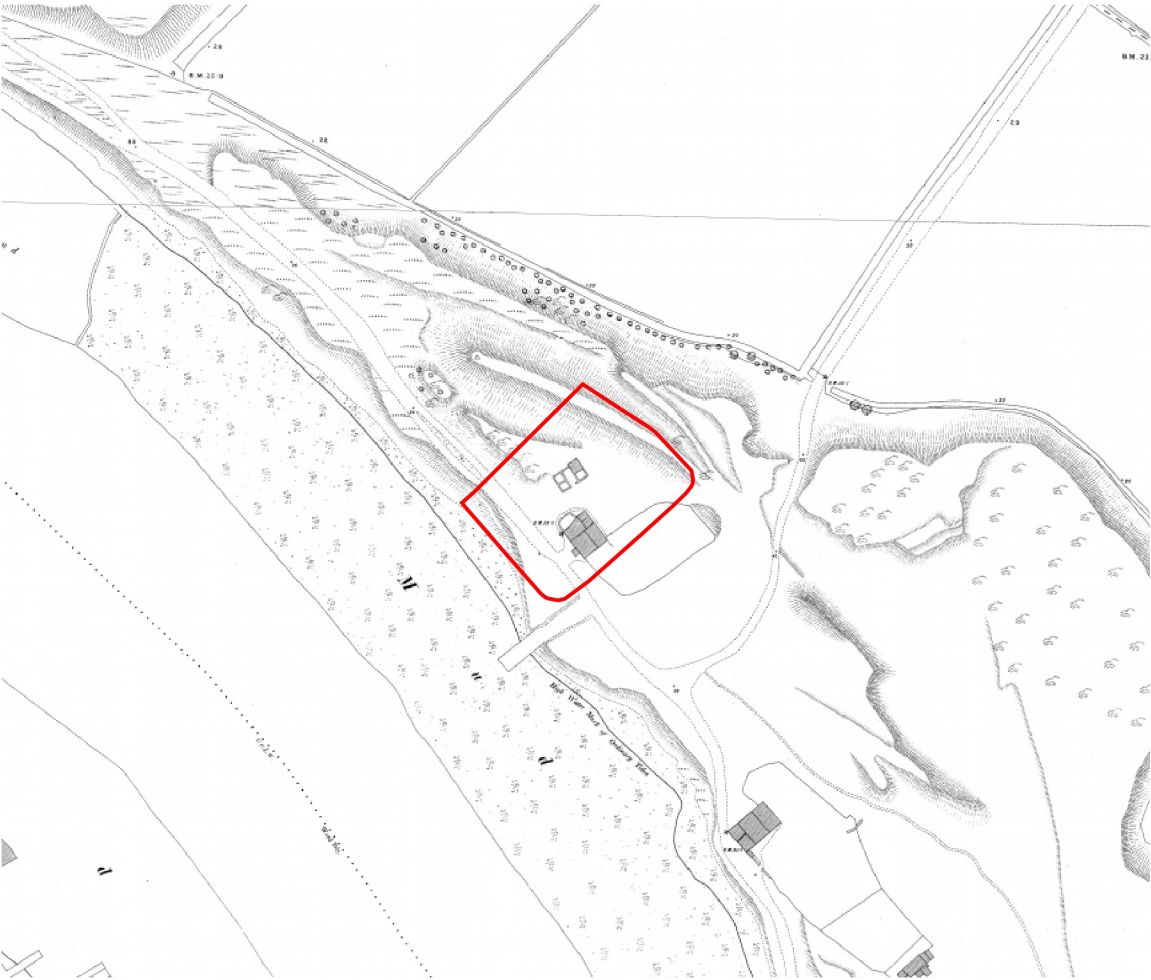
client			
Hedyn			
project title			
Coverack Road – Phase 2			
drawing title			
HER Records			
date	24 APRIL 2025	drawn by	DJo
drawing number	edp8348_d001c	checked	MBa
scale	1:5,000 @ A3	QA	GYo



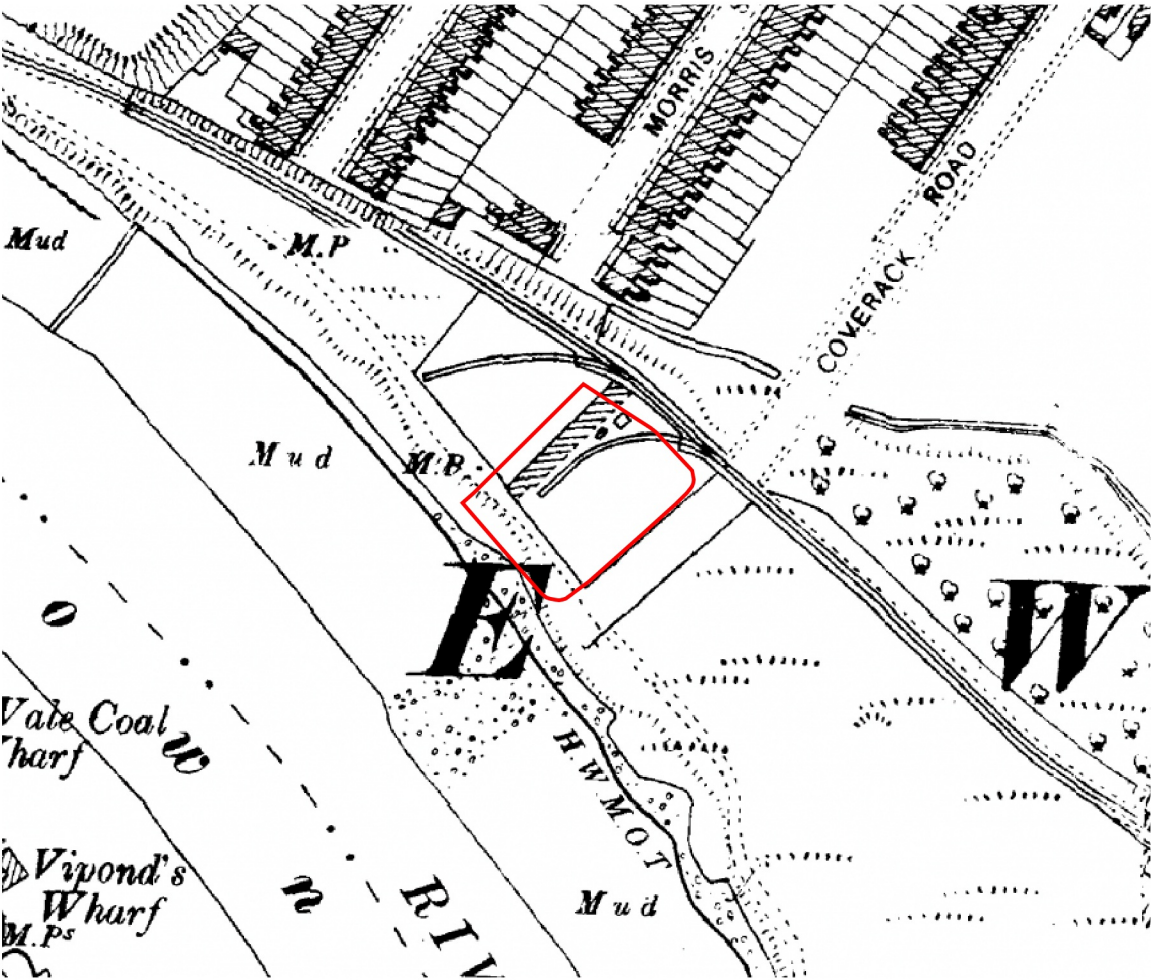
1836 John Wood Newport Town Map



1840 Christchurch Parish Tithe Map



1883-1884 Ordnance Survey



1901-1902 Ordnance Survey

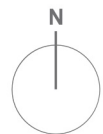
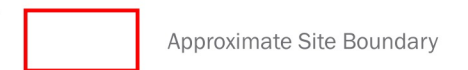
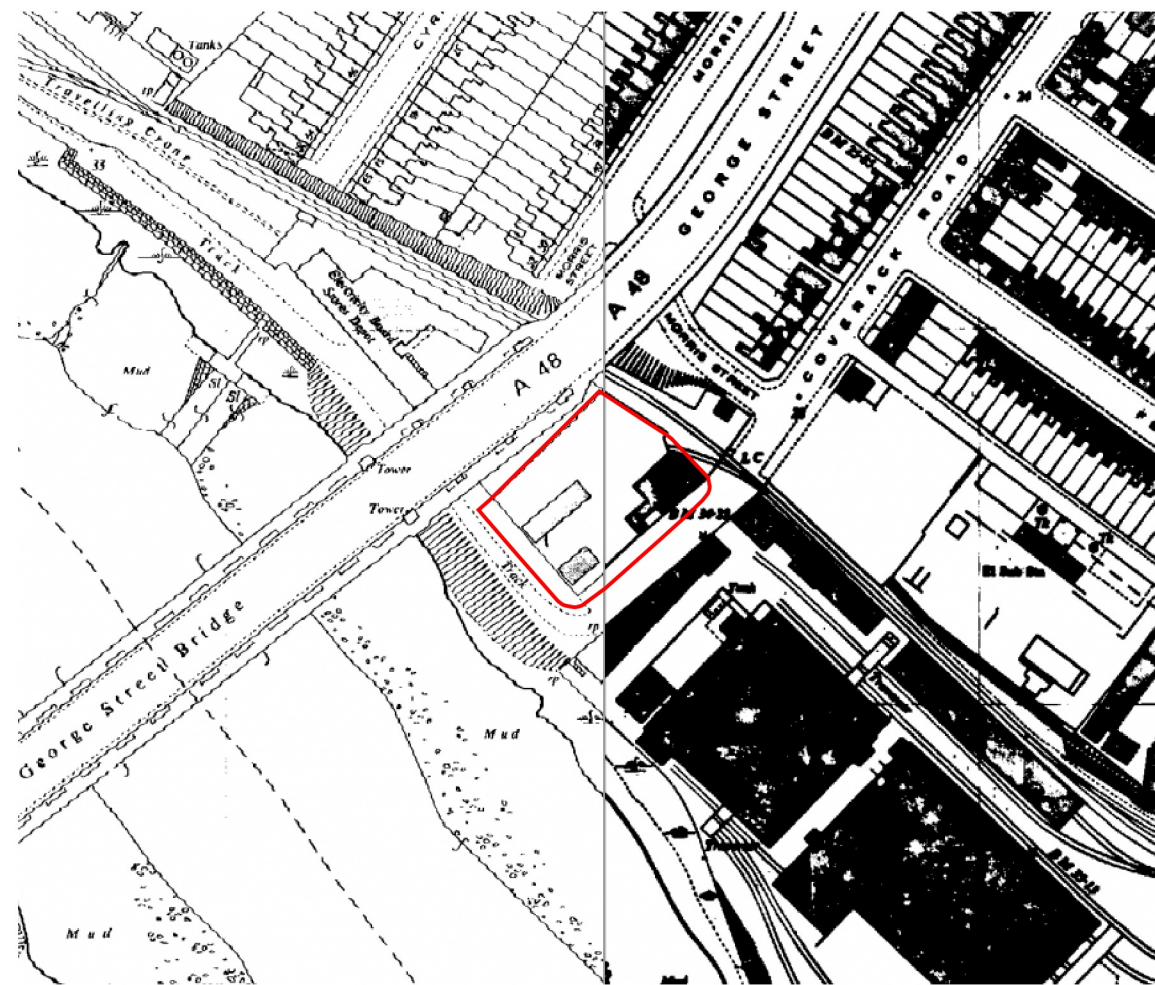
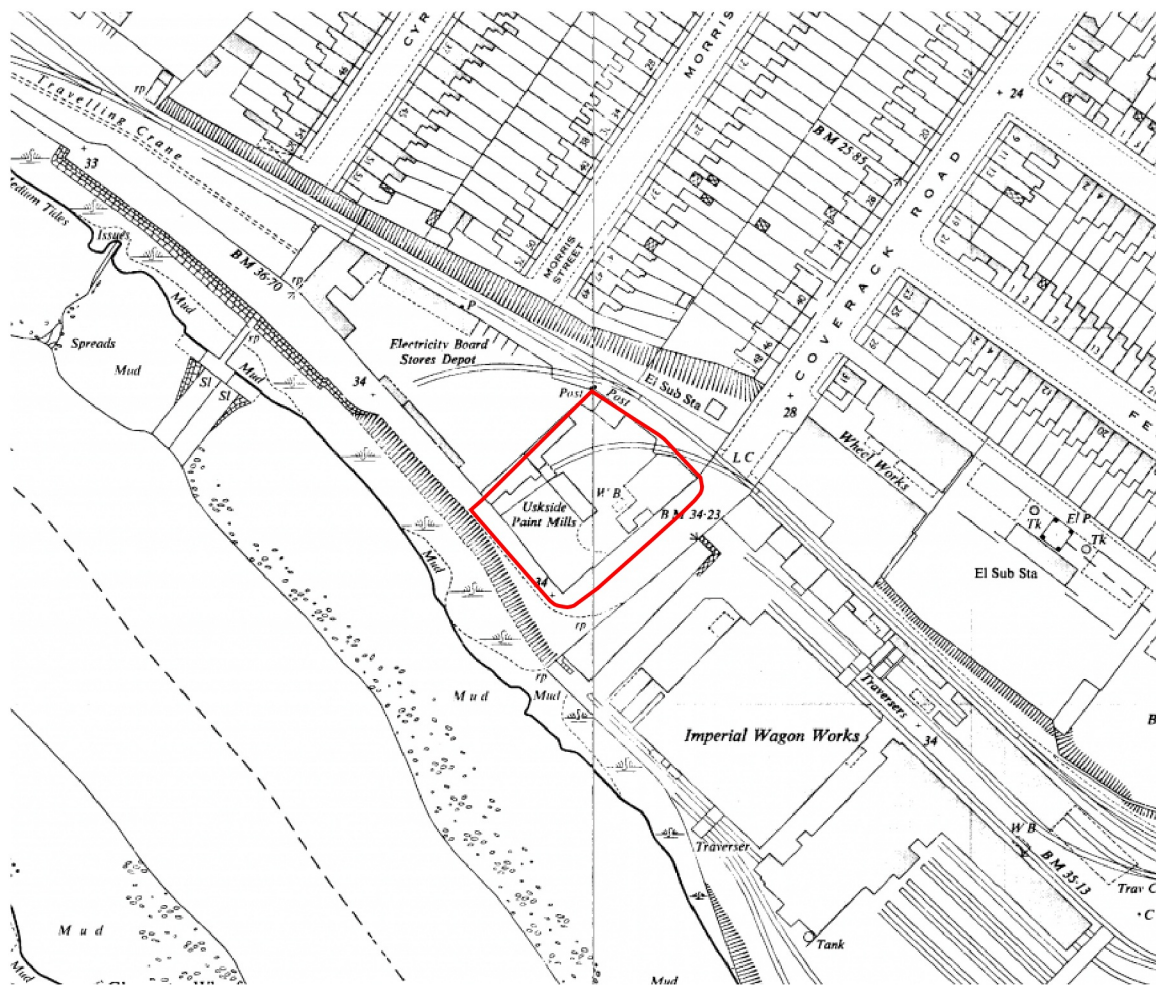
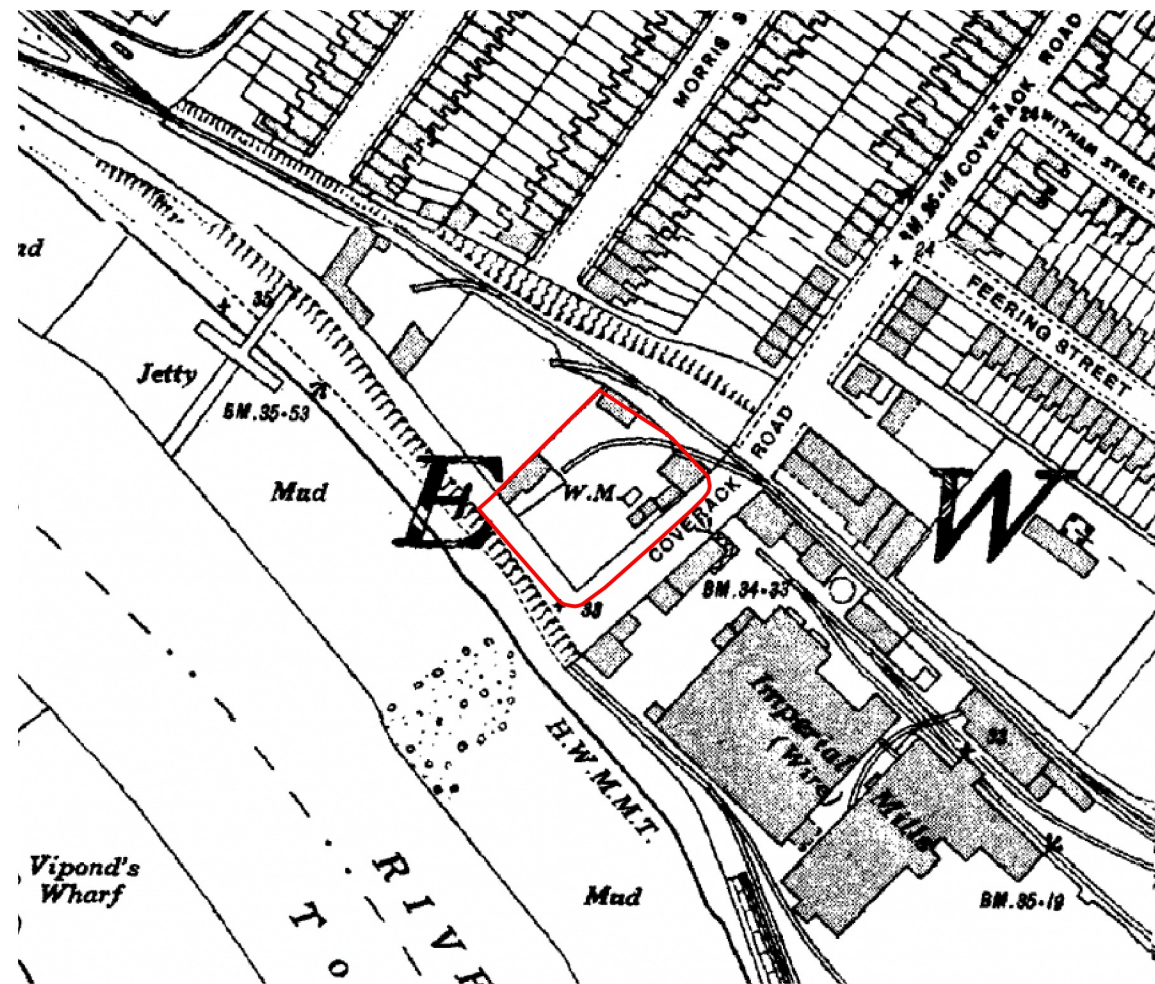
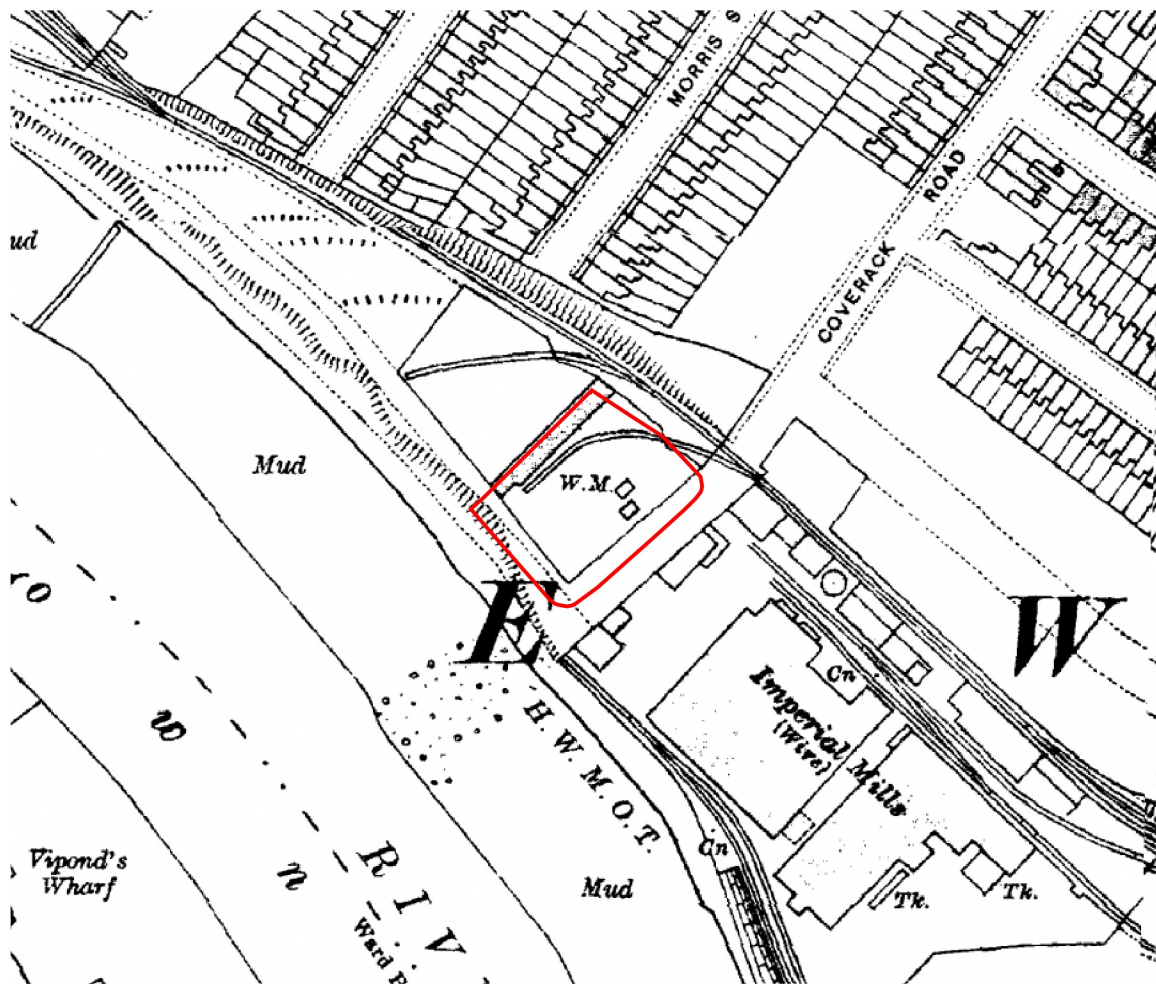
 Approximate Site Boundary



client			
Hedyn			
project title			
Coverack Road – Phase 2			
drawing title			
Historic Maps [Sheet 1 of 2]			
date	24 APRIL 2025	drawn by	DJo
drawing number	edp8348_d002c	checked	MBa
scale	1:2,000 @ A3	QA	GYo



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client

Hedyn

project title

Coverack Road – Phase 2

drawing title
Historic Maps
[Sheet 2 of 2]

date	24 APRIL 2025	drawn by	DJo
drawing number	edp8348_d002c	checked	MBa
scale	1:2,000 @ A3	QA	GYo



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