

# Delegated Decision Report

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|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------------------------------------|
| <b>Application No:</b> | <b>26/0172</b>                                                                                                                                                                                                               | <b>Statutory Period Expires:</b> | <b>7th May 2026</b>                 |
| <b>Site:</b>           | <b>Tredegar House, Car Park Pencarn Way Duffryn Newport NP10 8TW</b>                                                                                                                                                         |                                  |                                     |
| <b>Proposal:</b>       | <b>INSTALLATION OF 1NO. AUTOMATIC NUMBER PLATE RECOGNITION CAMERA MOUNTED ON NEW CAMERA COLUMN, REMOVAL OF 2NO. PAYMENT TERMINALS AND REPLACEMENT WITH NEW ALONG WITH ASSOCIATED POWER AND DATA CONNECTIONS AND TRENCHES</b> |                                  |                                     |
| <b>Applicant:</b>      | <b>National Trust</b>                                                                                                                                                                                                        |                                  |                                     |
| <b>Type:</b>           | <b>Full</b>                                                                                                                                                                                                                  | <b>Ward:</b>                     | <b>Tredegar Park And Marshfield</b> |
| <b>Decision:</b>       | <b>GRANTED WITH CONDITIONS</b>                                                                                                                                                                                               |                                  |                                     |

## 1. BACKGROUND

1.1 None.

## 2. SITE LOCATION AND CONTEXT

2.1 The site is located near Grade II\* Tredegar House forming the car park area. The site is accessed from Pencarn Way to the south.

## 3. DESCRIPTION OF DEVELOPMENT

3.1 The proposal seeks to install 1no. ANPR camera mounted on a new column along with replacement of both existing payment terminals.

## 4. RELEVANT SITE HISTORY

None relevant.

## 5. PLANNING POLICY

5.1 THE NATIONAL DEVELOPMENT FRAMEWORK: FUTURE WALES - THE NATIONAL PLAN 2040

Future Wales sets out the Welsh Government's land use priorities and provides a national land use framework for SDPs and LDPs. Future Wales concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas that need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.

Policy 1 - Where Wales Will Grow

Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking

Policy 9 - Resilient Ecological Networks and Green Infrastructure

5.2 PLANNING POLICY WALES (EDITION 12) 2024

5.3 Historic Environment (Wales) Act 2023

5.4 Technical Advice Note 15: Development, Flooding and Coastal Erosion  
Technical Advice Note 24: The Historic Environment

5.5 NEWPORT LOCAL DEVELOPMENT PLAN (2011-2026)

- SP1 – Sustainability
- SP3 – Flood Risk
- SP9 – Conservation of the Natural, Historic and Built Environment
- GP2 – General Amenities
- GP4 – Highways and Accessibility
- GP5 – Natural Environment
- GP6 – Quality of Design

- CE4 – Historic Landscapes, Parks, Gardens and Battlefields
- CE7 – Conservation Area
- T4 – Parking

#### 5.4 SUPPLEMENTARY PLANNING GUIDANCE

- Wildlife and Development
- Parking Standards

### 6. CONSULTATION RESPONSES

6.1 Principal Heritage Officer: This application site is located within Tredegar Park Conservation Area. Due to its proximity, it also has potential to impact upon the setting of the Registered Historic Park & Garden Tredegar Park, Cadw ref: PGW(Gt)48(NPT) and the GII Listed assets to the south of Tredegar House, identified as the "garden wall running SE from the Cedar Garden and with ached workshops at the SE end, flanking a pair of brick piers and wrought iron gates." (see Cadw Ref: 17100).

It is proposed to:

- Replace of two existing payment terminals.
  - o This is essentially a 'like-for like' replacement of the existing on site (to be painted black).
- Install a new Automatic Numberplate Recognition camera, mounted on a new 4 metre column, powered via an ached solar panel.
  - o This is proposed to be located opposite the principal vehicle entrance, adjacent to an existing tree.
  - o This element could be made less visually intrusive by ensuring the camera is also black-finished, to match the proposed camera column (and not 'Grey' as specified within drawing 100124714-MMD 00-XX-DR-A-2001 Rev.1)
  - o I can see no details provided regarding the "attached solar panel". What is the proposed size, location and orientation?
  - o Will these works impact upon the adjacent tree?
- Install a new Feeder Pillar adjacent to the existing CCTV column by the main carpark entrance.
  - o I am unclear on whether the existing CCTV columns benefit from consent, but they are unsightly in their plain galvanised finish. Colour for the proposed feeder column is unclear but drawing 100124714-MMD-00-XX-DR-A-2006 states that it comes "hot-dip galvanised" and that "Powder coated finish also available".
  - o This item should be black finished, to match the other street furniture within the area (secured by condition).
- Undertake belowground works.
  - o The proposed is outside any archaeologically sensitive area here and previous carpark groundworks make the presence of any archaeological interest seem very low.
  - o We will need to ensure via condition that all ground surfaces are finished to match following these works (secured by condition).

6.2 Ecology Officer: No response.

6.3 Tree Team: No response.

6.4 Environmental Health Officer: No response.

6.5 Highways Officer: No objection – no highways impact is anticipated.

6.6 CADW Park and Gardens:

#### Advice

Having carefully considered the information provided, we have no objection to the proposed development in regards to the registered historic park and garden listed in our

assessment of the application below.

The national policy and Cadw's role in planning are set out in Annex A.

### Assessment

#### Registered Park and Garden

##### **PGW(Gt)48(NPT) Tredegar Park**

This planning application is for an automatic number plate recognition camera, payment terminals and power and data connections at Tredegar House, Car Park, Duffryn, Newport, NP10 8TW.

The above registered park and garden is located inside 500m of the proposed development.

The proposed development at three points is located between some 10 and 50m from the southeast boundary of registered park and garden PGW(Gt)48(NPT) Tredegar Park, registered for the survival of parts of grand late seventeenth-century layout, including garden walls, gate screen, inorganic parterres and avenue. Its setting is on western edge of Newport, on low-lying ground in the Ebbw Valley, and on higher, rolling ground to the east and west. The original park is now severely truncated due to the encroachment of housing estates and other developments and the passage of major roads. Most of the gardens around the house, however, are well preserved and subject to restoration and conservation. Significant views are from the north-west front of the down a grand avenue of oaks.

The proposed development is for the installation of equipment in a car park comprising: 1 x Dual Lane Automatic Numberplate Recognition (ANPR) camera mounted on a new camera column 4 metres in height from the ground facing out of the car park (4G router), powered via an attached solar panel; Removal of 1 x existing terminal and the installation of 1 x (black in colour) mains powered, contactless and coin payment terminal measuring 1540mm in height, using a conversion plate; Removal of 1 x existing terminal and the installation of 1 x (black in colour) mains powered, contactless payment terminal measuring 1540mm in height, using a conversion plate; A power & data connection to power the ANPR cameras, including a trench to be dug measuring 10m in length, 0.1m in width and 0.45m in depth together. A power connection for the proposed parking terminals, this will require a trench to be dug measuring 5m in length, 0.1m in width and 0.45m in depth.

The car park area represents part of the compromised original surrounds of the registered park and garden and does not contribute to its significance, and the proposed equipment will be seen along with other existing facilities in the car park. As such whilst there may be a very slight visual change in the view from the registered park and garden this will not have any effect on the way that it is experienced, understood and appreciated. Consequently, the proposed development will not have an unacceptably damaging effect upon the setting of the registered park and garden PGW(Gt)48(NPT) Tredegar Park.

- 6.7 Natural Resources Wales: We have no objection to the proposed development as submitted and provide the following advice.

#### **Flood Risk**

The planning application proposes less vulnerable development. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and a TAN15 Defended Zone.

Given the scale and nature of the proposed development (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and consequences. We would also expect the developer to take the opportunity to incorporate flood resilient design where feasible.

Guidance on resilient design can be found in Chapter 13 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025, which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience.

We provide advice on our website Natural Resources Wales / Preparing for a flood which may be useful for the developer or occupant of the proposal.

### **Other Matters**

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

### **Advice for the Developer**

#### Pollution Prevention

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the NetRegs website.

- 6.8 Dwr Cymru/ Welsh Water: This site is crossed by a public water main with the approximate position being marked on the attached statutory watermain record. In accordance with the Water Industry Act 1991, Dwr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. Having regard to drawing reference 100124714-MMD-00-XX-DR-A-1093, it appears the proposed development would be situated within the protection zone of the public asset measured 3.6 metres either side of the centreline. Please note, the distance specified for this protection zone is indicative and based on industry standard guidelines. However, the depth of the asset will need to be verified on site which may infer a greater protection zone. For completeness, we recommend the developer refer to their title deeds to confirm if there are any covenants or restrictions associated with the asset crossing the proposed development site.

In this instance, it appears there is sufficient space and scope to re-position the development outside the protection zone of the asset. Therefore, it is strongly recommended that the drawing reference 100124714-MMD-00-XX-DR-A-1093 is amended to take into account the location of the asset crossing the site and we respectfully request we are re-consulted on receipt of this information. It is also recommended that the developer contact our Plan and Protect team ([PlanandProtect@dwrcymru.com](mailto:PlanandProtect@dwrcymru.com)) to carry out a survey to verify the location of the asset and establish their relationship to the proposed development.

Accordingly, for the reasons outlined above, we offer a **Holding Objection** until such time as additional/amended information has been submitted and request we are re-consulted on receipt of this information.

- 6.9 Wales & West Utilities: I enclose an extract from our mains records of the area covered by your proposals together with a comprehensive list of General Conditions for your guidance. This information is given as a general guide and its accuracy cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated.

Where the Wales & West Utilities (WWU) plan includes a warning label about our higher pressure apparatus you must contact the WWU dig team for further guidance. If it is deemed that a site visit is required for this location we require a minimum of 10 days' notice to arrange a site visit for our engineers to give further guidance. Depending upon the nature of the works the site visit may be deemed chargeable.

No liability of any kind whatsoever is accepted by Wales and West Utilities (WWU), its agents or servants for any error or omission. Please note that all WWU equipment on site should be assumed to be LIVE until proven otherwise.

Safe digging practices, in accordance with HS(G)47, Avoiding Danger from underground services must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. Safe working procedures should be defined and practiced.

Irrespective of whether the pipeline is directly affected by the proposed development I enclose for information our general requirements for working in the vicinity of gas pipelines operating above 2 barg (T/SP/SSW22). It is our strong recommendation in the interests of safety that these general requirements be adhered to.

There are minimum proximity distances for buildings from WWU mains depending on both the operating pressure and the material of the main. Advice should be sought from WWU prior to building works taking place to confirm these distances. For High Pressure pipelines you must seek further guidance from the HSE and Local Authority Planning team regarding their LUP distances regarding building proximities as these may be in addition to WWU proximity distances for a pipeline.

In the presence of our >2barg gas pipelines no excavations are to take place within 10m of the confirmed position of these mains without prior consultation with WWU.

WWU reserves its position completely to enforce the terms of any existing easement against the landowner, even if this results in any planning permission granted not being able to be fully implemented.

You must not build over any of our plant or enclose our apparatus.

Where diversions to WWU apparatus are needed to allow change to occur on site, the cost of these alterations may be charged to the persons responsible for the works.

- 6.10 National Grid: An assessment has been carried out with respect to NGET apparatus and the proposed work location. Based on the search area entered in the LSBUD system for assessment the search area has been found to not affect any NGET apparatus.

## **7. PUBLIC REPRESENTATIONS**

- 7.1 Neighbour notification letters were sent on the 13<sup>th</sup> March 2026 and a Site Notice was put up on the 20<sup>th</sup> March 2026. No comments received.
- 7.2 Coedkernew Community Council: No comments received.

## **8. ASSESSMENT**

### **8.1 Principle of Development:**

- 8.1.1 The site is located within an urban boundary as designated by the maps contained within the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). Therefore the principle of development is acceptable subject to other material planning considerations.

### **8.2 Flooding**

- 8.2.1 The site is located within a TAN15 Defended Zone and Flood Zone 3 (Sea) as identified by NRW's Flood Maps for Planning and consists of a less vulnerable form of development in accordance with the definitions contained within TAN15. Natural Resources Wales have raised no objection to the scheme but note that a Flood Consequences Assessment is not included with the submission. Natural Resources Wales state that the scheme could be acceptable subject to the developer being made aware of the potential flood risks and

consequences and therefore should incorporate flood resilient design where feasible. Specific guidance is provided within Chapter 13 of TAN15.

- 8.2.2 The proposal is considered to be a 'redevelopment' as the site would be considered as previously developed land in line with the definition within Planning Policy Wales (Ed.12). The car park is a form of less vulnerable development as per the definition within TAN15 (2025). The proposal is considered to not over intensify the use of the land or reduce the areas ability to absorb flood water or cause flooding elsewhere as the scheme seeks to replace 2no. existing payment kiosks and erect a ANPR column within the established car park. The proposal is considered acceptable in accordance with TAN15 and Policy SP3.

### 8.3 **Impact on the Listed Building and Conservation Area**

- 8.3.1 During the course of the application it was confirmed that a solar panel sited atop the ANPR column was an error and is not included on the proposed details.

- 8.3.2 The siting of the ANPR column within close proximity to the existing beech tree is noted. To ensure suitable protection measures are in place and a suitable excavation method, it is considered necessary for the attachment of a condition identifying what tree protection measures will be put in place and the digging method to limit the impact upon any present roots. The agent confirms that the feeder pillar can be black in colour; this is secured by way of condition. Regarding finished ground surfaces, a further condition shall be attached to ensure the appearance matches the existing. The proposed development is considered to meet the preserve test as contained within TAN24 and the Historic Environment (Wales) Act. The attachment of conditions suitably address the heritage considerations and thereby preserve the special features and setting of the listed building and conservation area in accordance with the Historic Environment (Wales) Act 2023, TAN24 and Policies SP9, GP6, CE4, and CE7.

### 8.3.3 **Impact on Parking and Highways**

- 8.3.4 The proposal does not reduce parking or alter the parking layout nor will it impact upon traffic flows or pedestrian routes; as such, the proposal accords with Policies GP4 and T4.

### 8.4 **Visual Impact**

- 8.4.1 The proposed 2no. kiosks seek to replace existing kiosks in the same location of similar height and colour. The proposed feeder pillar and camera column would introduce additional street furniture, however through the attachment of a condition to ensure these are black and the general openness of the site, it is considered that the proposed street furniture would not result in an adverse impact upon the character and appearance of the area or visual amenities. The proposal accords with Policies GP2 and GP6.

### 8.5 **Ecology and Biodiversity**

- 8.7.1 Planning Policy Wales (Ed.12) sets out that planning applications should be supported by a proportionate Green Infrastructure Statement setting out how the step-wise approach has been considered in order to achieve a net gain in biodiversity.
- 8.7.2 The application is accompanied by a Green Infrastructure Statement which confirms the proposal would not include removal or damage of any green infrastructure – including trees. The proposal includes a biodiversity enhancement in the form of 400sqm of native hedge planting within the overflow carpark.
- 8.7.3 It is considered that the proposed enhancement is acceptable and achieves the aims of Planning Policy Wales (Ed.12) for a net gain in biodiversity. The proposal accords with Policy GP5.

### 8.4 **Other Matters**

- 8.4.1 The comments from Welsh Water are noted and that the indicative plan shows a Welsh Water public water main crossing the site. They have issued an objection to the scheme and request the proposed development is relocated to accommodate this.
- 8.4.2 As the scheme seeks to replace 2no. existing payment kiosks in the same location, it is considered unnecessary for the proposed kiosk to be relocated as no ground works are proposed to facilitate installation as existing power supply connections are to be used. It is

noted that the presence of DCWW's apparatus may require a separate agreement between the landowner/applicant and DCWW, this would be a separate matter falling outside the remit of the T&CPA and would not involve the LPA, accordingly this matter would not warrant the refusal of this application.

## **9. OTHER CONSIDERATIONS**

### **9.1 *Crime and Disorder Act 1998***

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the proposed decision.

### **9.2 *Equality Act 2010***

The Equality Act 2010 identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership.

### **9.3 Having due regard to advancing equality involves:**

- removing or minimising disadvantages suffered by people due to their protected characteristics;
- taking steps to meet the needs of people from protected groups where these differ from the need of other people; and
- encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

### **9.4 The above duty has been given due consideration in the determination of this application. It is considered that there would be no significant or unacceptable impact upon persons who share a protected characteristic, over and above any other person, as a result of the proposed decision.**

### **9.5 *Planning (Wales) Act 2015 (Welsh language)***

Section 31 of the Act clarifies that impacts on the Welsh language may be a consideration when taking decisions on applications for planning permission so far as it is material to the application. This duty has been given due consideration in the determination of this application. It is considered that there would be no material effect upon the use of the Welsh language in Newport as a result of the proposed decision.

### **9.6 *Newport's Well-Being Plan 2018-23***

The Wellbeing of Future Generations (Wales) Act 2015 imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principle to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. This duty has been considered during the preparation of Newport's Well-Being Plan 2018-23, which was signed off on 1 May 2018. The duty imposed by the Act together with the goals and objectives of Newport's Well-Being Plan 2018-23 have been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable impact upon the achievement of wellbeing objectives as a result of the proposed decision.

## **10. CONCLUSION**

### **10.1 The proposed development is considered acceptable and would not represent significant harm on the Grade II\* listed building or park and gardens of Tredegar House.**

## **11. DECISION**

### **GRANTED WITH CONDITIONS:**

01 The development shall be implemented in accordance with the following plans and documents:

- National Trust Car Park Infrastructure Proposed Equipment Detail Power and Data Cable Depths (Drawing ref: 100124714-MMD-00-XX-DR-A-2010 Rev P01)
- National Trust Car Park Infrastructure Proposed Equipment Detail Flowbird Strada S5 Terminal Mains (Drawing ref: 100124714-MMD-00-XX-DR-A-2009 Rev P02)
- National Trust Car Park Infrastructure Proposed Equipment Detail Feeder Pillar Automatic Number Plate Recognition (ANPR) (Drawing ref: 100124714-MMD-00-XX-DR-A-2006 Rev P01)
- National Trust Car Park Infrastructure Proposed Equipment Camera Column (Drawing ref: 100124714-MMD-00-XX-DR-A-2002 Rev P01)
- National Trust Car Park Infrastructure Proposed Equipment Detail AXIS P1465-LE Bullet Camera Automatic Number Plate Recognition (ANPR) (Drawing ref: 100124714-MMD-00-XX-DR-A-2001 Rev P01)
- National Trust Car Park Infrastructure Proposed Equipment Detail Proposed Site Plan (Drawing ref: 100124714-MMD-00-XX-DR-A-1093 Rev P02)
- National Trust Car Park Infrastructure Existing Site Plan (Drawing ref: 100124714-MMD-00-XX-DR-A-1092 Rev P02)
- National Trust Car Park Infrastructure Site Location Plan (Drawing ref: 100124714-MMD-00-XX-DR-A-1091 Rev P02)

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

02 No development, to include demolition, shall commence until a Tree Protection Plan (in accordance with BS 5837:2012) has been submitted to and approved in writing by the Local Planning Authority. The Tree Protection Plan shall contain full details of the following:-

- (a) Trees and hedges to be retained/felled clearly identified and marked on a plan;
- (b) Trees and hedges requiring surgery;
- (c) The root protection areas to be identified on plan for retained trees and hedges;
- (d) The type and detail of the barrier fencing to be used to safeguard the root protection areas;
- (e) The precise location of the barrier fencing, to be shown on plan.
- (f) Method of ground works excavation relating to the ANPR column.

The development shall be carried out in accordance with the approved Tree Protection Plan.

Reason: To protect important landscape features within the site in accordance with Policy GP5 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

03 Prior to the installation of the feeder pillar and ANPR column as shown on the Proposed Site (Drawing ref: 100124714-MMD-00-XX-DR-A-1093 Rev P02) paint colour details shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the agreed details and retained for the duration of the use.

REASON: To ensure integration with the wider setting of the Listed Building and Conservation Area in accordance with Technical Advice Note 24, Historic Environment (Wales) Act 2023 and Policies SP9 and CE7 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

04 Prior to the first use of the feeder pillar and ANPR column the hard and soft landscaping surfaces associated with the approved development shall be completed in materials to match the existing and retained as such for the duration of the use.

REASON: To ensure integration with the wider setting of the Listed Building and Conservation Area in accordance with Technical Advice Note 24, Historic Environment (Wales) Act 2023 and Policies SP9 and CE7 of the Newport Local Development Plan 2011 – 2026 (Adopted January 2015).

#### **NOTE TO APPLICANT**

01 The development plan for Newport is the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). Policies SP1, SP3, SP9, GP2, GP4, GP5, GP6, CE4, CE7 and T4 were relevant to the determination of this application.

02 Due to the minor nature of the proposed development (including any demolition) and the location of the proposed development, it is considered that the proposals did not need to be screened under the Environmental Impact Assessment Regulations.