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ASSOCIATED BRITISH PORTS

NEWPORT DOCKS - PROPOSED PLASTERBOARD MANUFACTURING FACILITY

HERITAGE IMPACT STATEMENT

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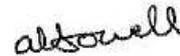
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NON-TECHNICAL SUMMARY

A Heritage Impact Statement was prepared in respect to proposed development on land adjacent to West Way Road, Alexandra Docks, Newport, Wales (NGR ST 31369 84170). It was commissioned by Associated British Ports, who intend to develop the Site for a Plasterboard Manufacturing Facility. This report identifies potential direct and indirect impacts through the proposed development of the Site to designated historic assets.

In terms of direct impacts, the Site contains no designated historic assets and the proposed development would not therefore result in any direct impact to their significance.

Due to the location of the Site within the existing heavily industrialised Newport Docks, it was considered that the potential for in-direct impacts would be limited to the Historic Landscape Character Area 15 Eastern St Brides, which forms part of the Gwent Levels Historic Landscape, designated as a Historic Landscape of Outstanding Historic Interest.

An assessment of the significance of the historic landscape and the contribution of its setting was undertaken including on-site observations and it was confirmed that there would be no impact to the significance of the historic asset as a consequence of change within its setting as a result of the proposed development.

1 INTRODUCTION

- 1.1 This report has been prepared in respect to development proposals on land adjacent to West Way Road, Alexandra Docks, Newport, Wales (NGR ST 31369 84170). Development proposals comprise 15,140m² Plasterboard Manufacturing Facility. The length of the facility will be of 202m with a maximum eaves height of 18m and maximum ridge height of 21m at its highest element. The predominant eaves height of the proposed development will be approximately 9.2m and the predominant ridge height will be approximately 12.5m. External storage areas and hardstanding for parking is also proposed along with an area of habitat enhancement to the south of the Site . A strip of vegetation approximately 10m wide will be maintained along the western boundary as a habitat corridor.
- 1.2 The Site contains no statutory designated historic assets. Nor does the Site fall with any wider landscape designation such as AONB or Registered Historic Parkland and therefore the proposed development would not result in any direct impacts on designated historic assets.
- 1.3 This report provides a general assessment of the significance and setting of nearby historic assets upon which the development has the potential to indirectly impact. Indirect impacts would be caused by changes in the setting of a given historic asset which may affect the ability to understand and appreciate its overall significance.
- 1.4 In accordance with Planning Policy Wales (2018), Technical Advice Note 24: The Historic Environment (2017) and Cadw guidance 'Heritage Impact Assessment in Wales' (2017), this report provides a detailed assessment of the significance of the designated assets potentially affected, including the contribution that their setting makes to their significance, in order to determine the level of harm which may be experienced, if any to their significance.
- 1.5 This report should be read in conjunction with the submitted plans prepared by Stride Treglown and the Design and Access Statement and the Landscape & Visual Impact Assessment (Report reference CA11637/003) prepared by Wardell Armstrong. Full drawings, reports and schedules are therefore not repeated within this report.

2 DEFINITIONS OF TERMS AND HERITAGE PLANNING POLICY CONTEXT

National Planning Policy

2.1 Chapter 6 of Planning Policy Wales (PPW) (2018) sets out the Welsh Governments objectives to the protection, management and conservation of the historic environment in Wales and requires that:

- Decisions are based upon an understanding of the significance of historic assets;
- Archaeological remains are conserved, both for their own sake and for their role in education, leisure and economy;
- The character of historic buildings is safeguarded and manage changes to ensure their special architectural and historic interest is preserved;
- The character or appearance of conservations are preserved or enhanced whilst helping them remain vibrant and prosperous;
- The special interest of sites of the register of historic parks and gardens in Wales are preserved; and
- Areas of registered historic Welsh landscapes are conserved.

2.2 These objectives are emphasised within Technical Advice Note 24 'The Historic Environment' (2017) which defines a historic asset 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.*' (TAN24 Para 1.7).

2.3 Where historic assets are to be affected by a proposed development TAN 24 advises that is for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of designated assets and their settings. TAN24 goes on to state that the following factors should be considered in an assessment:

- The significance of the Asset and the contribution the setting makes to that significance;
- The prominence of the historic asset;
- The expected lifespan of the proposed development;
- The extent of tree cover and its likely longevity; and
- Non-visual factors affecting the setting of the historic asset.

2.4 Conservation Principles for the Sustainable Management of the Historic Environment in Wales (2011) & TAN24 state that the significance of an asset derives from an understanding of the associated heritage values, these being evidential value, historical value, aesthetic value and communal value. The significance of an asset also derives from its setting which *‘includes the surrounding in which it is understood, experienced and appreciated embracing present and past relationships to the surrounding landscape’* (TAN24 Para 1.25). The immediate and wider surroundings of an asset can impact upon the associated heritage values and may make a positive, negative or neutral contribution to the significance.

Best Practice Guidance

2.5 Cadw have prepared and published a series of best-practice guidance documents, which along with TAN24, are intended to enhance the provisions of the Historic Environment (Wales) Act which was passed by the National Assembly for Wales on 9 February 2016 and became law after receiving Royal Assent on 21 March 2016.

2.6 These documents are intended to help manage change within the Welsh historic environment in line with conservation philosophies and values set out Conservation Principles. Specifically, the following best practice guidance documents have been consulted as part of the development of this report:

- Setting of Historic Assets in Wales (May 2017);
- Heritage Impact Assessment in Wales (May 2017);
- Caring for Historic Landscapes (2007); and
- A Guide to Good Practice on Using the Register of Landscapes in the Planning and Development Process.

Local Planning Policy

2.7 The Newport Local Development Plan 2011-2026, adopted January 2015, sets out the strategies and policies to shape the future growth of Newport up until 2026. The LDP sets out the following objectives and strategic policies relevant to the historic environment, with relevant text highlighted in bold:

Objective 5 – Conservation of the Built Environment

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.

SP8 Special Landscape Areas

Special landscape areas are designated as follows within which proposals will be required to contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features:

- i) North of Bettws
- ii) West of Rhiwderin
- iii) **Wentlooge Levels**
- iv) River Usk
- v) Caldicot Levels
- vi) Wentwood

Policy SP9 Conservation of the Natural, Historic and Built Environment

The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals.

CE4 Historic Landscapes, Parks, Gardens and Battlefields

Sites included in the register of landscapes, parks and gardens of special historic interest and identified historic battlefields should be protected, conserved, enhanced and where appropriate, restored. Attention will also be given to their setting.

Pre-application Advice and Discussions

- 2.8 An EIA Screening Opinion from the Glamorgan-Gwent Archaeological Trust (GGAT) (15th July 2019) stated that as it is *'unlikely that archaeological deposits will be encountered during the work, and that it would not be possible to acquire any information from the piling where it would reach beneath these depths, ...we do not recommend any archaeological mitigation'*. As such, archaeology has been scoped out of this assessment and no further archaeological work is anticipated. The trust made no comments with regards to designated historic assets.
- 2.9 A pre-application meeting with Newport City Council (19th August 2019) confirmed that the Site was not part of Gwent Levels Historic Landscape Area, and that the Site would not impact upon it. It was agreed that an ASIDOHL was not required to accompany the application.
- 2.10 Cadw were engaged under the pre-application process and the response was received 23rd December 2019. Their comments are discussed below in paragraphs 4.2-4.6.

3 METHODOLOGY

- 3.1 Conservation Principles for the Sustainable Management of the Historic Environment in Wales (2011) & Technical Advice Note 24 (2017) state that the significance of an historic asset derives from an understanding of the associated heritage values, these being evidential value, historical value, aesthetic value and communal value.
- 3.2 For a definition of these ‘values’ a useful reference document is Cadw’s *Conservation Principles for the sustainable management of the historic environment in Wales (2011)* (see glossary).
- 3.3 The significance of an asset also derives from its setting which ‘*includes the surrounding in which it is understood, experienced and appreciated embracing present and past relationships to the surrounding landscape*’ (TAN24 Para 1.25).
- 3.4 In respect of identifying the importance of setting to the overall significance of a historic asset, Cadw’s best practice guidance presented in the *Setting of Historic Assets in Wales (2017)* has been utilised. Section 4 of the document identifies a four-stage process to assess the impact of change to the setting of the historic asset which whilst not explicitly expressed, this has been applied to this assessment process:
- Stage 1 – Identify 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 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.
- 3.5 The assessment of potential impacts to historic assets is made on professional judgement and experience.

4 BASELINE DATA

Stage 1 – Identify Historic Assets Potentially Affected

Designated Heritage Assets

- 4.1 A review of Cadw GIS datasets has established that there are no designated historic assets within the Site or immediately adjacent.
- 4.2 In accordance with Schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 paragraph (l)(ii)(e), a Zone of Theoretical Visibility (ZTV) and accompanying Site visits (where publicly accessible) assessed the visibility of Scheduled Monuments up to a distance of 5km from the Site.
- 4.3 There are six scheduled monuments within the 5km search area of the Site (See Figure 2). These comprise Newport Castle (MM009), Tredegar Hill Fort (MM084), Coed Y Defaid Camp (MM134), Goldcliff Moated House Site (MM092), Gwern y Cleppa Burial Chamber (MM022) and Castell Glas Castle Mound (MM190).
- 4.4 It is considered that whilst there is potential for inter-visibility with Tredegar hill fort (MM084) located c3.25km north-west of the Site, Coed y Defaid Camp (MM134) located c4.32km north-west of the Site, Gwern y Cleppa Burial Chamber (MM022) located c3.65 north-west of the Site and Goldcliff Moated House Site (MM092) located c4.7km to the east of the Site, these monuments are generally screened in views from the Site by extensive vegetation and feature existing built form and those views that are possible from the monuments towards the Site would perceive the proposed development at a distance and in the context of the present extensive industrial development of the Newport Docks area. Therefore, it is anticipated that the resulting change within the distant setting of these monuments would not affect an appreciation of their heritage values and their significance.
- 4.5 Castell Glas Castle Mound (MM190) and Newport Castle (MM009) have no inter-visibility with the Site and the proposals would have no effect on an appreciation of heritage values and their significance.
- 4.6 For the reasons outlined above, the six scheduled monuments have not been taken forward for further assessment within this report. Cadw were consulted as part of the formal consultation process principally in respect to Tredegar hill fort (MM084) and Coed y Defaid Camp (MM134) and in their response received 23rd December 2019, agreed with these conclusions.

- 4.7 In accordance with the Cadw response received 23rd December 2019 and Cadw advice presented within ‘The Setting of Historic Assets in Wales’ (2017) a stage 1 assessment has been undertaken of the remaining resource comprising World Heritage Sites, Listed Buildings, Registered Parks and Gardens, Registered Battlefields and Historic Landscapes up to a distance of 3km from the Site to identify historic assets potentially affected by the proposed development.
- 4.8 In respect to Registered Parks and Gardens, there are three designated parks and gardens within the 3km search area comprising the grade II registered Bellevue Park and St Woolas Cemetery located to the north of the Site and the grade II* registered Tredegar Park located to the north-west of the Site.
- 4.9 As part of the stage 1 assessment, ZTV survey has been undertaken on the identified parks and gardens and is included as Figure 2. This survey identifies that there is no inter-visibility with St Woolas Cemetery.
- 4.10 Some inter-visibility is identified between the Site and Tredegar Park, located c2.5km (at its closest point) to the north-west of the Site and Bellevue Park located c2.7km to the north of the Site. Those views possible from Tredegar Park and Bellevue Park towards the Site would perceive the proposed development at a distance and within views which present existing built form within their vicinity and which present the Site in the context of the present extensive industrial development of the Newport Docks area.
- 4.11 Additionally, the register descriptions of the two parks confirms that the Site does not form part of any key views through or into the assets identified as being important to understanding significance. In respect to Tredegar Park views identified as being important are those views north-west from the house along the oak avenue, the direction of this view being away from the Site. Also, in respect to the essential setting of the park this is identified as being the farmland to the north-west.
- 4.12 With regards to important views from Bellevue Park, the east view from the terraces within the park over Newport and towards the Bristol Channel are identified as being important. The focus and direction of this view is away from the Site.
- 4.13 Therefore, it is anticipated that the resulting change within the distant setting of these assets would not affect an appreciation of their heritage values and their significance. Subsequently, these assets have not been taken forward for further assessment within this report.

- 4.14 The Gwent Levels Historic Landscape, designated as a Historic Landscape of Outstanding Historic Interest, lies 140m west of the Site to the west of the Ebbw River which is located adjacent to the west of the Site (see Figure 1).
- 4.15 There are no listed buildings or Conservation Areas within the vicinity of the Site.
- 4.16 Due to the scale, form and location of the Site within the wider landscape, it has been identified that the potential for change within the setting of designated assets which may negatively affect their significance is limited to the Historic Landscape Character (HLC) Area 15 Eastern St Brides, which forms part of the Gwent Levels Historic Landscape, designated as a Historic Landscape of Outstanding Historic Interest.
- 4.17 As such only the HLC Area 15 Eastern St Brides is subject to detailed assessment within this report.
- 4.18 Understanding the contribution of setting to the HLC Area 15 is discussed with Section 5 of this report and will help determine the level of harm to the significance of the asset, if any, which may be experienced as a consequence of the proposed development and allow for any necessary mitigation and offsetting as discussed in Section 6.

Non-Designated Heritage Assets

- 4.19 With regards to the archaeological potential of the Site, it is considered that the industrial development of the Newport Docks which also included the diversion of a section of the River Ebbw to the west of the Site, would have truncated and/ or removed archaeological remains. As such, potential impacts to archaeological remains will not be considered in this report in line with the comments received from GGAT (see para 2.8 above).

Brief Historic Context

- 4.20 A dock, known as the Town Dock, was first constructed inland at Newport in 1842, and was extended to the north in 1858. However, the continued expansion of the overseas coal trade, fuelled by improved railway links, led to the need to further expand the port facilities. Alexandra Dock, built on the west side of the Usk River, was officially opened in 1875. In 1907, it was further extended with the construction of the South Dock; the existing dock renamed as the North Dock.
- 4.21 The area of the Site was established when the South Dock was constructed. During the excavations, a section of the River Ebbw was straightened and diverted to the west of the Site, and the old riverbed was incorporated into the Docks area, which

essentially formed the area within the Site. The historic mapping (see Appendix 2) shows that the Site was largely left as vacant land, annotated as being 'marshy', which is possibly why it remained undeveloped. Across the southern area of the Additional Habitat Areas, the 1922 OS map showed railway lines, which had been removed by the 1999 OS map. The map also showed a reservoir to the west of the area partially extending into the boundary. In the south of the Site, a building is marked in 1983, which was likely associated with the Docks. However, it is not shown on the subsequent 1999 OS map, indicating that it had been removed by then.

- 4.22 The Site is located to the east of the Gwent Level Historic Landscape. This designated landscape is divided into individual character areas with Historic Landscape Character (HLC) Area 15 Eastern St Brides lying to the east and separated from the Site by the realigned Ebbw river. This landscape occupies higher coastal land at the eastern end of Wentlooge. It is characterised by an irregular field pattern of small fields and sinuous roads with remnants of roadside waster, dispersed settlement, seawall including demolished wall and engineered drainage features including fen-banks and surface ridging.

Site Visit

- 4.23 A Site visit was undertaken in August 2019. The weather was warm and clear.
- 4.24 The Site comprises currently unoccupied land with the majority comprising vegetation. There are small areas of hardstanding located within the north and south of the Site and former pathways traverse the Site. Large trees along its western boundary were present (see Appendix 1 plates 1-2).
- 4.25 No extant remains of the building shown in 1983 historic mapping (See Appendix 2) was observed in the south of the Site although areas of concrete slab and concrete blocks remain (see Appendix 1 plate 2).
- 4.26 To the north of the Site lies industrial units and port related land. The east of the site is bound by a sand and gravels supplier and industrial works. To the south of the site is the mouth of the River Usk and the Severn Estuary.
- 4.27 Beyond the western boundary of the Site on the western side of the Ebbw River, is the eastern extent of the Gwent Levels HLC Area 15 (see Appendix 1 plate 3). It was partially screened in views by the existing vegetation along the western boundary of the Site.

- 4.28 The Site visit confirmed that change may occur within the setting of the Gwent Levels Historic Landscape, specifically to the Historic Landscape Character Area 15 Eastern St Brides, which forms a sub-character area of the Gwent Levels.
- 4.29 The significance of the asset and its setting is discussed in Section 5 below.

5 ASSESSMENT OF SIGNIFICANCE AND SETTING

- 5.1 For ease of reference this section of the report has been sub-characterised to follow the broad, 4 step-approach to assessment as detailed within Cadw’s best practice guidance *‘The setting of Historic Assets in Wales’* (2017) with stages 1 and 2 discussed below and stage 3 discussed within Section 7. It is anticipated that stage 4 would form part of any subsequent post-determination monitoring should planning permission be granted.
- 5.2 It has been established as part of the Stage 1 Assessment (see section 4 above) that the proposals have the potential to cause change within the setting of HLC Area 15 Eastern St Brides. This area, part of the Gwent Levels Historic Landscape, is shown on Figure 1.
- 5.3 An assessment of the asset’s values is presented below. These are discussed in proportion with the importance of the asset and as far as is necessary in order to determine the importance of setting to the asset and the potential effect of the proposals on this. The statement of significance is not intended to be a detailed analysis of the asset, for which the reader should be referred to CCW/ Cadw/ ICOMOS UK: Countryside Council for Wales - Joint Initiative, 2001, *Register of Landscapes of Historic Interest in Wales, Part 2.1 Register of Landscapes of Outstanding Historic Interest in Wales* and http://www.qgat.org.uk/cadw/historic_landscape/Gwent%20Levels/English/GL_Main.htm.

Stage 2 – Define and Analyse the Setting

- 5.4 The detailed assessment for the identified historic asset is presented below. The significance of a historic asset is defined within the Conservation Principles for the Sustainable Management of the Historic Environment in Wales (2011) & TAN24 as deriving from *‘an understanding of the associated heritage values, these being evidential value, historical value, aesthetic value and communal value’*.

HLC Area 15 Eastern St Brides (Gwent Levels)

- 5.5 The value of HLC Area 15 is derived from its ‘evidential’, ‘historic’, ‘aesthetic and ‘communal’ values.

Evidential Value

- 5.6 The vast tidal range within the Severn estuary has governed the past activities of man across the HLCA and the Gwent Levels as a whole. The successive episodes of

enclosure and reclamation which have occurred since the Roman period, has led to the formation of a varied and diverse landscape of different time periods, and there is nowhere else in Wales where it is possible to make these period distinctions so easily.

- 5.7 Within the HLCA, not only does the existing network of sea walls¹, field ditches, reens², gouts³, grips⁴ and fen banks provide evidence of extensive land reclamation, enclosure and drainage employed since the medieval period and which are still in use today, but the presence of now unused natural channels, shown as palaeochannels on aerial photographs, provide evidence for the initial reclamation and inundation of the levels over thousands of years.
- 5.8 The nature of the low-lying Gwent Levels comprising estuarine alluvium, means that there is a proven and possibly quite vast potential for extensive, waterlogged archaeological and palaeo-environmental deposits below ground from the prehistoric period onwards, which includes the area of the intertidal mudflats beyond the sea walls and banks.
- 5.9 Furthermore, the oval enclosure defined in the field-boundary pattern to the south of St Brides Church in the south-west of the HLCA away from the Site, probably marks the earliest settlement focus i.e. medieval.
- 5.10 This knowledge base contributes to the historic character of the HLCA and the Gwent Levels as a whole, and the understanding of the skills and ingenuity of the inhabitants to adapt and populate this area.

Historic Value

- 5.11 The illustrative historic value of Eastern St Brides is closely linked to the evidential and aesthetic values.
- 5.12 The landscape visible today is a result of successive episodes of enclosure and reclamation (which has occurred since the Roman period) and have preserved evidence for distinctive patterns of settlement, enclosure and drainage systems being employed. These are illustrated in the irregular field patterns of small fields, sinuous roads, dispersed settlement and isolated farmsteads.

¹ Present line may date from the 16th century

² Large artificial ditches which are controlled by weirs or stanks. Water is discharged through the gouts.

³ Tidal flaps along the sea walls.

⁴ Rectangular patterns of shallow ditches on the field surface to speed drainage if rain water. They discharge into the field ditches.

- 5.13 The landscape, with its complex of interlinked ditches, is inextricably associated with the agricultural use of the land, and its survival is dependent on the landowners and authorities who are responsible for drainage maintenance.
- 5.14 Furthermore, the Gwent Levels as a whole, has its own local terminology, that provides an insight into the origins of the landscape over 1,800 years ago and how it continues to be managed today.

Aesthetic Value

- 5.15 The aesthetic value of the HLCA derives from the layout and features of the landscape, which include irregular field patterns, sinuous roads and isolated farmsteads, which are the result of the conscious agricultural management of the landscape particularly from the medieval period onwards.
- 5.16 The location of the area adjacent to the estuary also offers an aesthetic quality, adding to the isolated and tranquil experience of the landscape and allows a visual appreciation of the inter-related role between the estuary and the historic management and adaptation of the HLCA.
- 5.17 The main settlement is St Brides Wentlooge, located in the south-west of the HLCA away from the Site. It is set back from the main road, with the parish church (grade II* listed) located at the northern end of the village. It is not visible in the wider landscape due to the presence of vegetation.
- 5.18 The integrity and coherence of the HLCA are high, although demolition of the relic sea wall in this area has detracted slightly from the coherence of this landscape.

Communal Value

- 5.19 The communal value of the HLCA is interlinked with how it is accessed by the public, which includes the presence of PROWs and bridleways across the area. The Wales Coast Path is also located through the south of the HLC.

Setting

- 5.20 The HLCA is located to the north-west of the town of Newport where it forms a distinctive, consciously designed landscape heading west along the Severn Estuary. As part of the floodplain, the character area is level, and punctuated by mature trees and hedgerows which define the field boundaries. Its design is one of practicality; formed over centuries of successive agricultural development and maintenance.

- 5.21 The area also contains modern intrusions including the railway line in the north-west corner and large electricity pylons crossing the north-east portion, close to the Site, and which are aligned north-east to south-west across the area.
- 5.22 Whilst some views from the lower ground across the landscape are possible albeit interrupted by mature vegetation, the presence of large electricity pylons and the sea wall along the southern edge of the character area (which prevents views across the estuary), views from higher areas in the landscape for example from the sea wall, provide the best views to appreciate the context to the character area as a whole.
- 5.23 North facing views are possible of the built development at Duffryn including commercial buildings at the large Imperial Park Industrial Estate. Beyond this, the land rises to the rolling hills of the Usk Vale (see Appendix 1 plate 4).
- 5.24 The landscape beyond the eastern boundary of the HLCA is heavily industrialised (see Appendix 1 plate 5). Immediately on the eastern side of the Ebbw river, the Newport Docks area is visible containing numerous large scale commercial and industrial buildings as well as cranes and floodlights. Beyond the docks on the eastern side of the River Usk, there is the Llangland Way Reevesland Industrial Estate of which the three wind turbines located to its south are clearly visible from the western parts of the HLCA.
- 5.25 To the south of the docks the east and west piers, which mark the entrance into the docks from the Usk, are visible (see Appendix 1 plate 6). Beyond the pier, to the south-east of the HLCA on the western bank of the River Usk, there is the large Severn Power Station which contains three tall chimney stacks (see Appendix 1 plate 6). Across the docks area to the south-east, are large electricity pylons which cross the River Usk into the HLCA.
- 5.26 It is to the east and south of the HLCA which is considered to contribute most expressively to its overall significance; these aspects of its setting allowing an appreciation of its evidential, historic and aesthetic values.
- 5.27 To the east, the character area merges with the HLC Area 16 Western St Brides, and there is a sense of continuity as one traverses through the two character areas, with the same medieval field systems visible and the use of the area (mostly east and north) for agrarian purposes.
- 5.28 To the south, views from the sea wall take in the vast mudflats, saltmarshes and open water of the Severn estuary (see Appendix 1 plate 7). This dynamic and dramatic

seascape is fundamental to the setting and character of the Gwent Levels as a whole allowing an appreciation of the historic relationship of reclamation and adaptation between the estuary and the land as well adding to the aesthetic value of the area.

6 EMBEDDED MITIGATION

- 6.1 Enhancement measures can be designed to better reveal the significance of an asset, such as through improved access or interpretation, the restoration of an historic feature or view, or the creation of a new view which better frames an asset.
- 6.2 Harm can be minimised through the creation of long-term visual/acoustic screening or through the recognition of sensitive receptors within sympathetically designed schemes such that built form is demonstrably positioned in order to reduce adverse impacts.
- 6.3 In accordance with the planning policy every effort to conserve the setting of designated heritage assets potentially affected by the proposed development of the Site should be undertaken. The proposed Site plan (drawing reference 153091-STL-00-00-DR-A-ZZZZ-01001) has included the following embedded mitigation measures as part of the design process which would be used to minimise harm:
- **Layout** – the proposed development is aligned to follow the line of the existing industrial units to the north of the Site.
 - **Building design** – the massing and scale of the building is to be in proportion with existing industrial development within the docks area. The scale, variations in ridge heights and fragmentation of the external elevations (recessed sections, advanced sections) to break up the expanse of the elevation.
 - **Landscaping** – the strip of vegetation (trees) beyond the western boundary of the Site to be retained.

7 HERITAGE IMPACT ASSESSMENT

Stage 3 – Evaluate the Potential Impact of Change or Development

7.1 The potential in-direct impact to the historic asset as a consequence to proposed development within the Site is discussed below.

HLCA Eastern St Brides (Gwent Levels)

7.2 The Site is located within the Newport Docks area, an existing, extensively industrialised landscape. Whilst the proposed development would introduce additional built form close to the eastern boundary of the Gwent Levels it is no closer than the existing industrial form to the north of the Site.

7.3 Having considered the evidential, historic, aesthetic and communal values of the HLCA Eastern St Brides, which forms part of the Gwent Levels Historic Landscape (a landscape included on the Register of Historic Landscapes of Outstanding Historic Interest), and the contribution that its setting makes towards an understanding and appreciation of this, it is anticipated that there would be no harm as a consequence of the proposals. This is based on the following grounds:

- The Site does not provide any contribution or interpretation to understanding the heritage values presented by the asset;
- The Site is not considered to either positively or negatively contribute to its setting;
- The proposed development would not physically impact upon the heritage values presented by the landscape;
- The proposed development would not impact on elements of the asset's setting which positively contribute to its significance as a medieval relict landscape along the Severn estuary with the visual relationship between the estuary and the adjoining HLCA 16 sustained;
- The retention of the existing vegetation along the western boundary of the Site would provide some screening of the proposed development in east/north east facing views from the Site which soften its edge; and
- The proposed development will be viewed within the context of the existing industrial landscape associated with Newport Docks and its form, scale and design are in keeping with this industrial character and backdrop.

8 ADDITIONAL MITIGATION MEASURES

Stage 4 – Consider Options to Mitigate the impact of a Proposed Change or Development

- 8.1 Sections 5 and 7 of this report have anticipated in-direct effects of the proposed development to not result in changes to the setting of the HLCA which would affect an appreciation or understanding of its associated heritage values and therefore no impact to its significance would result.
- 8.2 As such, there is no requirement for the inclusion of additional mitigation measures above the embedded mitigation, discussed in Section 6, within the detailed design and/ or as a condition to any subsequent grant of permission.

9 CONCLUSION

- 9.1 This assessment, undertaken with due respect to guidance published by the Welsh Government & Cadw and with the utilisation of terminology in full accordance with the recently published best practice guidance, has assessed the potential impact of the proposed development on the significance of designated historic assets within the vicinity of the Site.
- 9.2 The baseline identified that the Site is located to the east of the Gwent Levels Historic Landscape, a landscape included on the Register of Landscapes of Outstanding Historic Interest in Wales. The Site is specifically adjacent to Historic Landscape Character Area 15 Eastern St Brides which contributes to the significance of the wider landscape area as a medieval relict landscape which retains evidence of the adaptation and management of the land for agrarian purposes.
- 9.3 The assessment process has anticipated that the proposed development would result in no change to the elements of the HLCA's setting which contribute towards an understanding and appreciation of its heritages values. As such no harm to the overall significance of the Historic Landscape has been identified.
- 9.4 The proposals comply with national and local policy on heritage grounds.

10 GLOSSARY

- Aesthetic value** *We may value historic assets for their visual qualities, whether they result from conscious design and craftsmanship, or from the fortuitous effect of change over time. Tastes alter and so do historic assets: earlier records and careful analysis of what survives may help in appreciating aesthetic value.*
Source: Cadw Conservation Principles 2011
- Communal value** *Historic assets may be cherished by the people and communities who relate to them, and they may play an important part in collective experience or memory. Historic assets can have economic as well as social value with the capacity to provide a valuable source of income or employment.*
Source: Cadw Conservation Principles 2011
- Evidential value** *Every historic asset has a unique story to tell. The surviving historic fabric and detail — whether above or below ground — helps us to understand when and how each historic asset was made, how it was used and how it has changed over time. Pictorial and documentary sources may also increase our understanding.*
Source: Cadw Conservation Principles 2011
- Harm** *Change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of an historic asset.*
Source: Cadw Conservation Principles 2011
- Historical value** *Historic assets may illuminate particular aspects of the past. They can help us to understand how people lived and worked, and the beliefs and values they cherished. They may be associated with notable people or events. Through evocation and association, historic assets can connect past people, aspects of life and events with the present.*
Source: Cadw Conservation Principles 2011
- Significance** *The sum of the cultural heritage values often set out in a Statement of Significance.*
Source: Cadw Conservation Principles 2011
- Setting of a heritage asset** *The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape.*
Source: Cadw Conservation Principles 2011

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APPENDIX 1
Plates



Plate 1: Northern part of the site.



Plate 2: Southern part of the site. Concrete slab and blocks remaining.



Plate 3: View from western boundary of the site towards the Gwent Levels.



Plate 4: View north over the Gwent Levels to the Usk Vale.



Plate 5: View east towards the Newport Docks area.



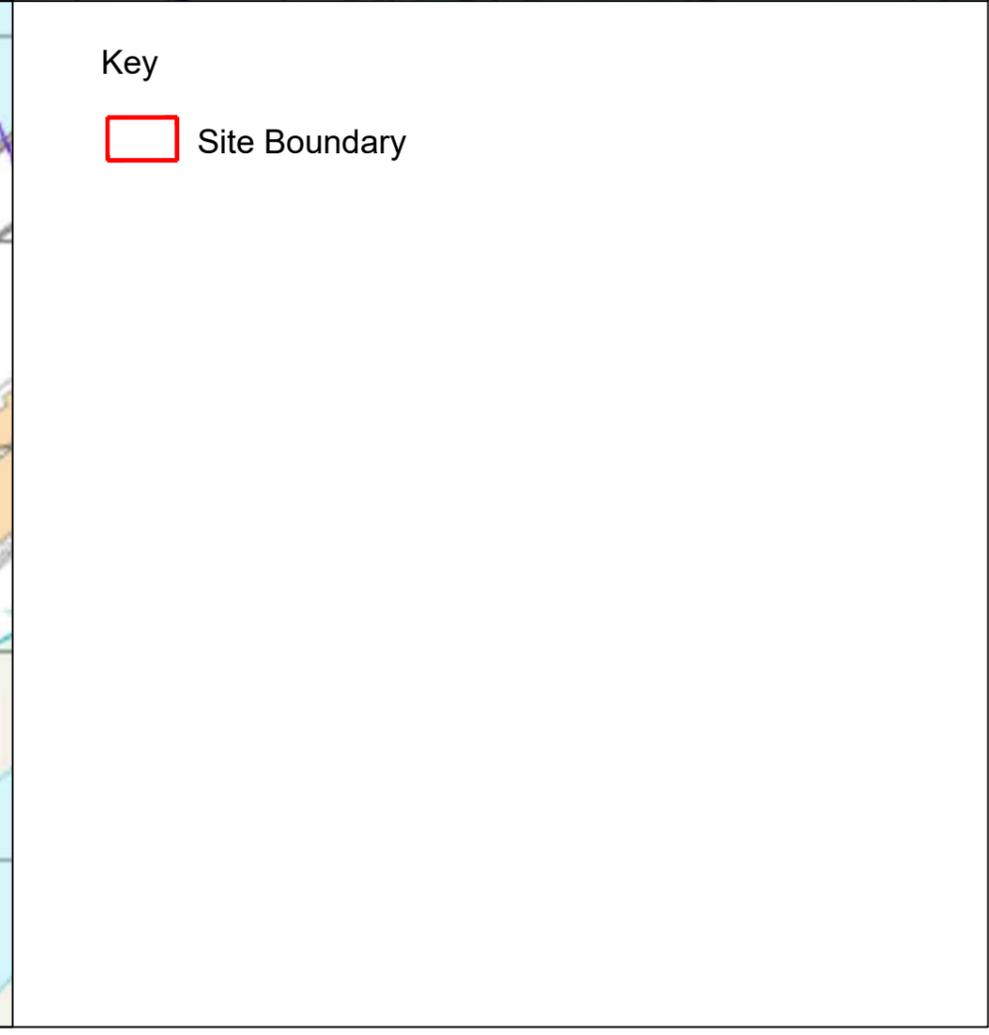
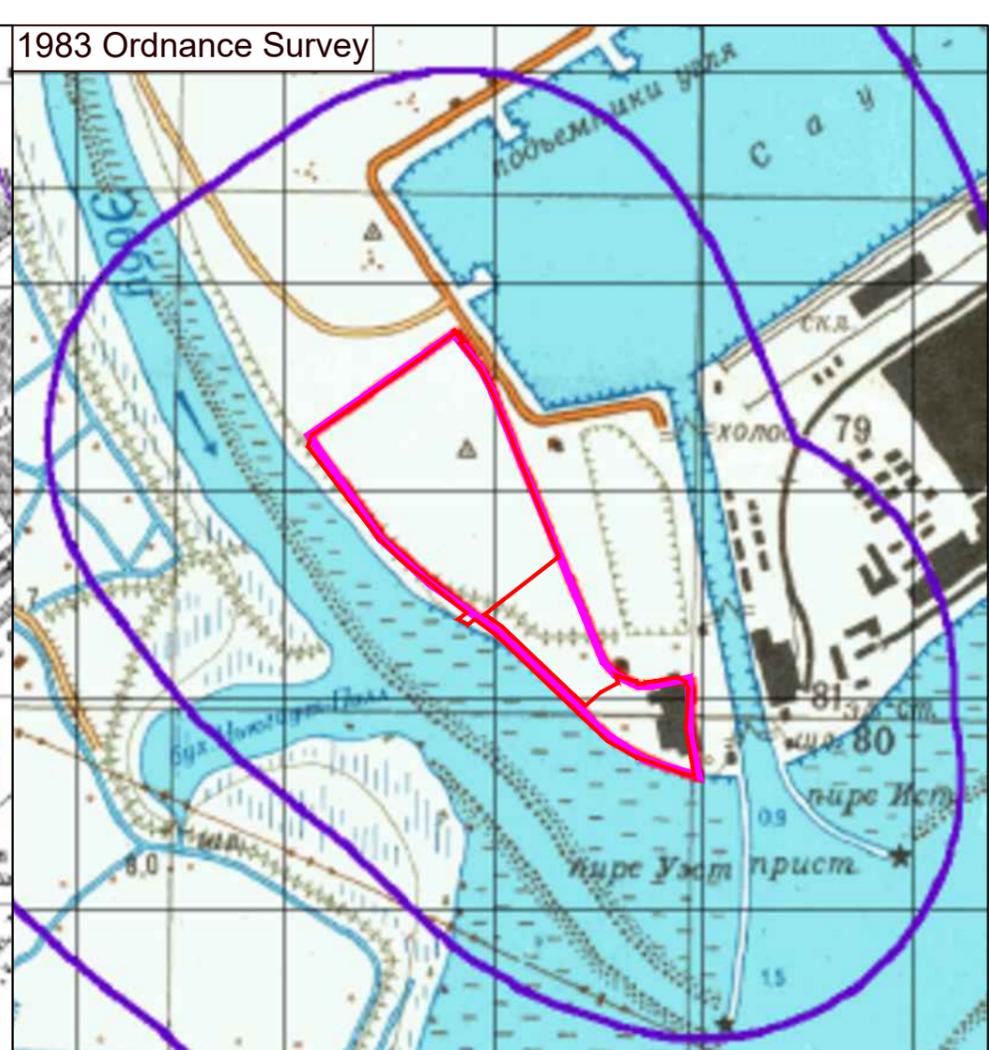
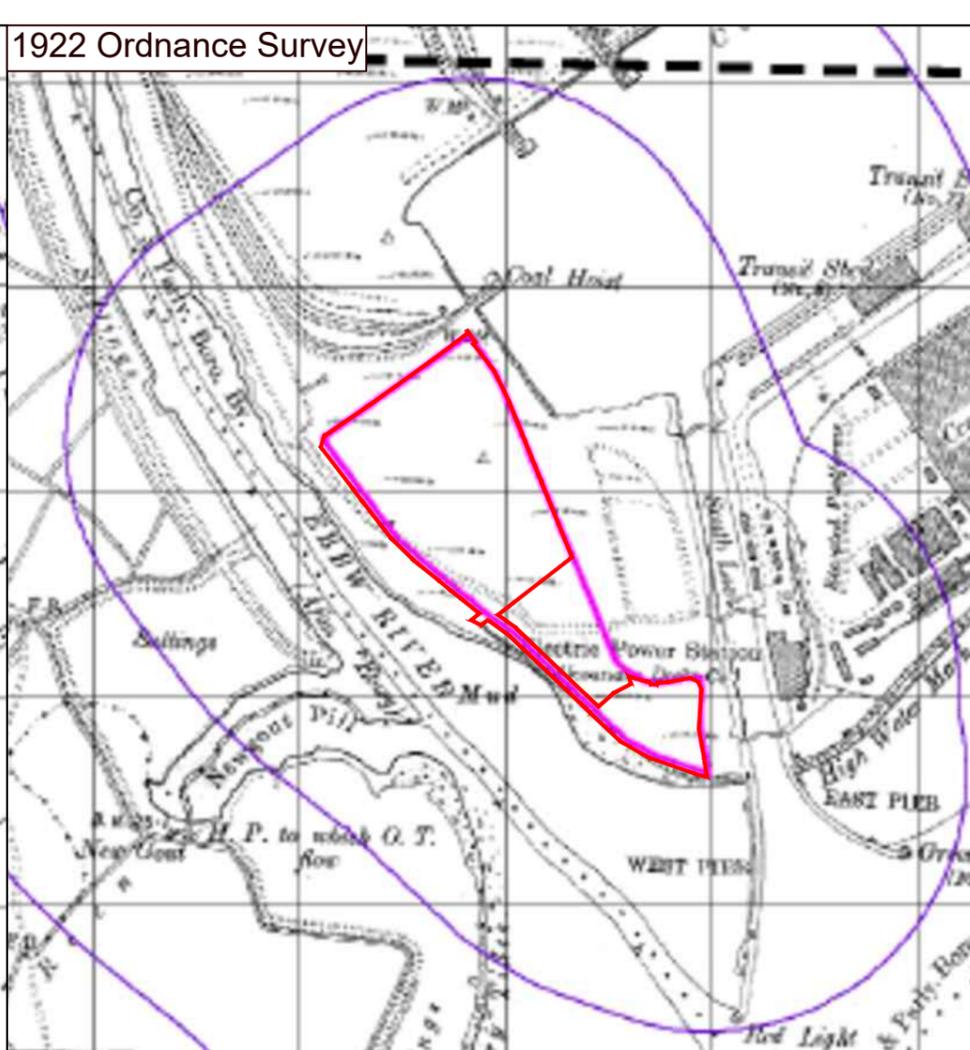
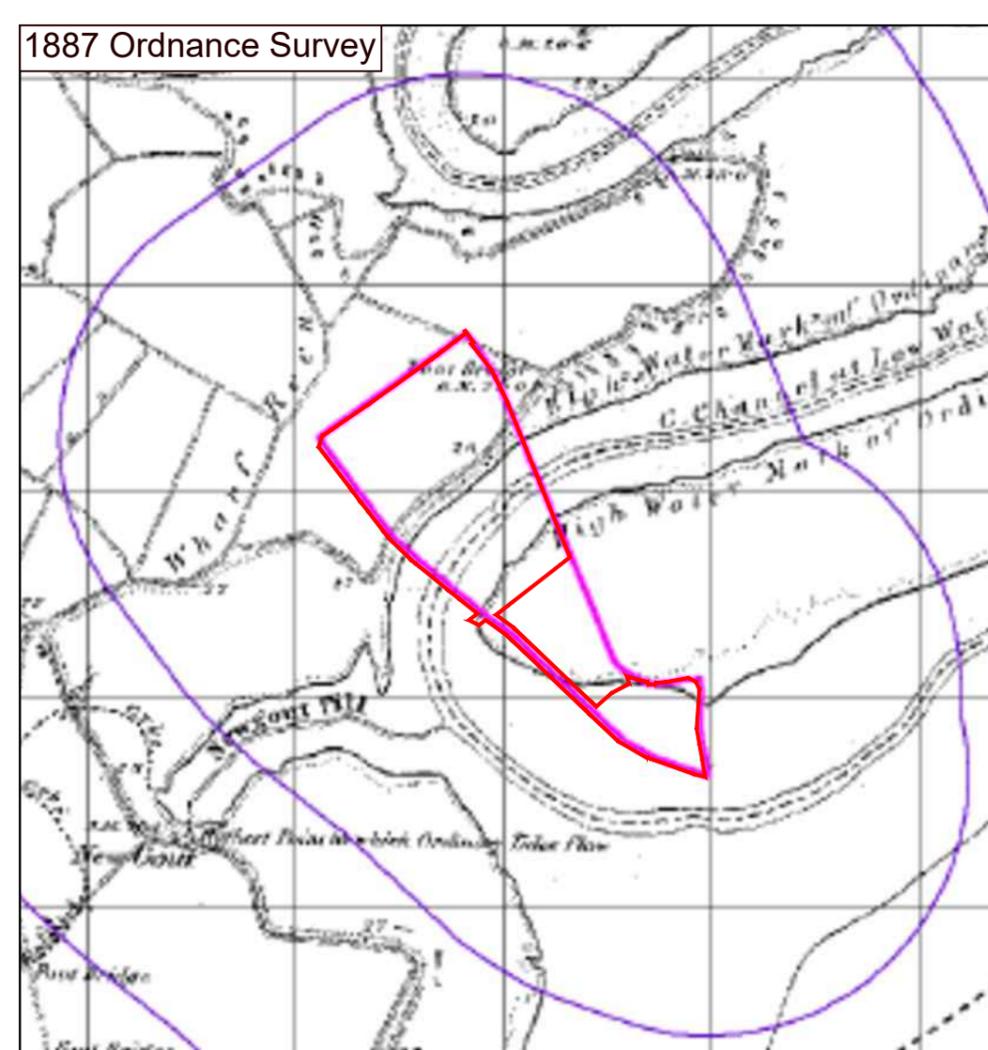
Plate 6: View south-east towards the Newport Dock piers and power station.



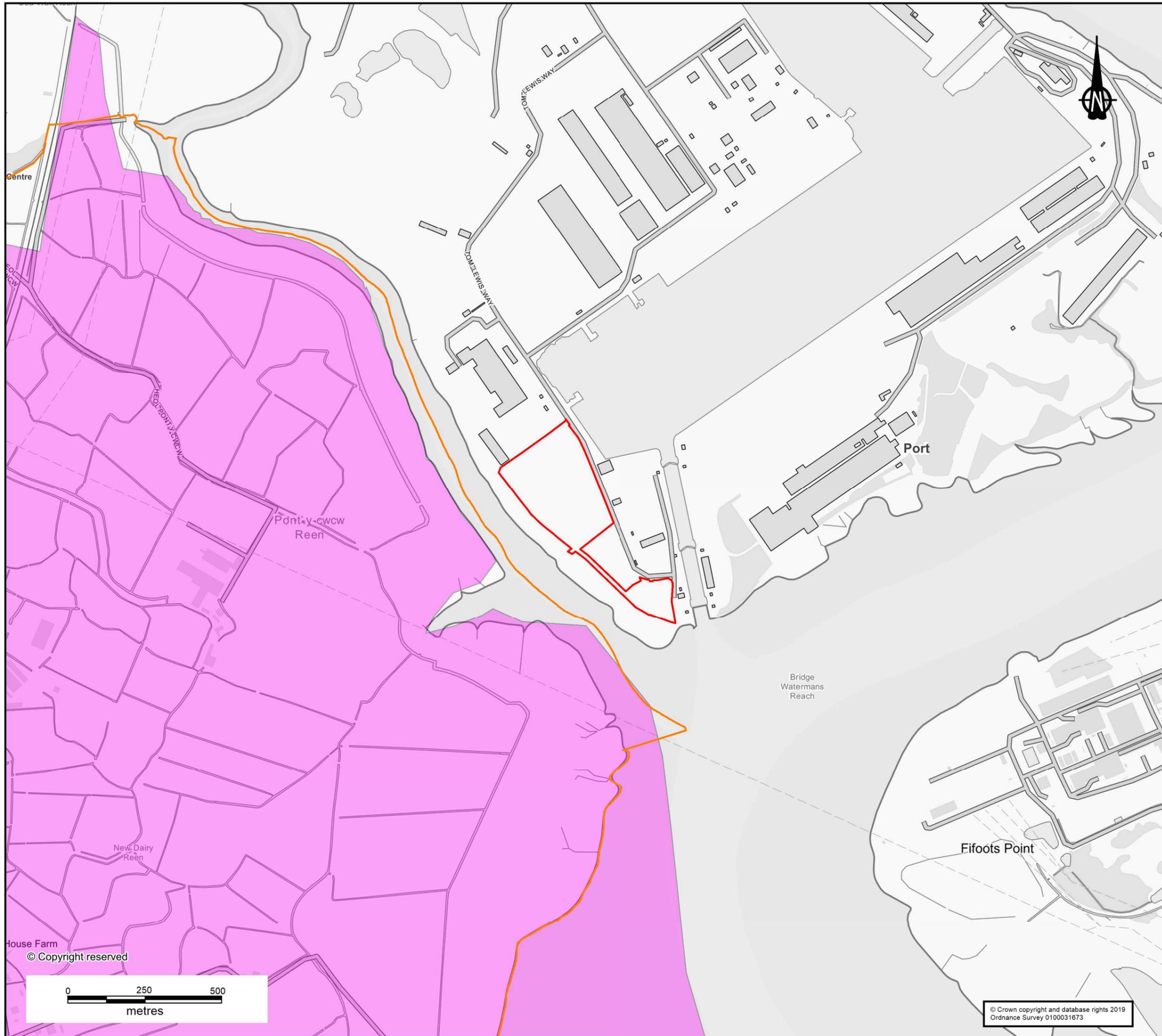
Plate 7: View south over the Severn estuary.

APPENDIX 2

Historic Maps



DRAWINGS



KEY

- Site Boundary
- Gwent Levels Historic Landscape
- HLCA Eastern St Brides

REVISION	DETAILS	DATE	DRAWN	CHKD	APPD
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CLIENT
Associated British Ports

PROJECT
**New Manufacturing Plant,
Newport Docks**

DRAWING TITLE
**Figure 1
Location of the Gwent Levels**

DRG No	CA11637-005	REV	B
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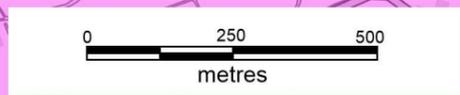
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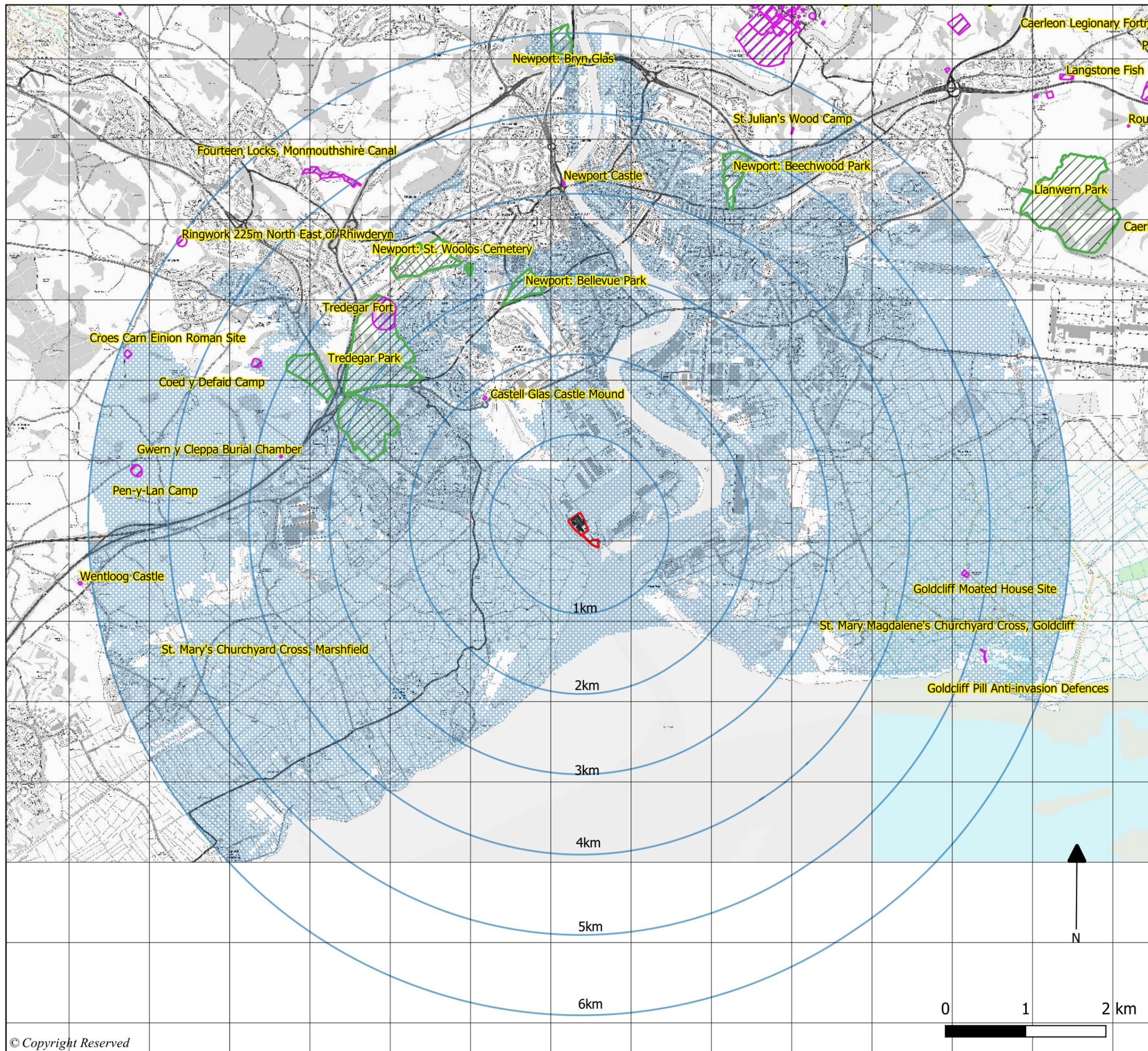
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DO NOT SCALE FROM THIS DRAWING

KEY

	Scheduled Monuments
	Registered Parks and Gardens
	Site Boundary
	Visible Areas

REVISION	DETAILS	DATE	DRN	CHK'D	APP'D
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CLIENT
Associated British Ports

PROJECT
Plasterboard Manufacturing Plant, Newport Docks

DRAWING TITLE
Figure 2
ZTV and Heritage Assesst (Scheduled Monuments and Registered Parks and Gardens)

DRG No.	CA11637-0014	REV	01
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		DATE	January 2020
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