

Report



Cabinet Member for Sustainable Development

Part 1

Date: 23 January 2019

Subject Endorsement of four Conservation Area Appraisals, including boundary changes and associated procedures

Purpose The purpose is to:

- Endorse the content of the four Conservation Area Appraisals, including the proposed boundary changes to the Conservation Areas;
- Agree for the formal legal process to amend the Conservation Areas to proceed;
- Once the legal process has formally concluded, the Council will adopt the four Conservation Areas Appraisals as Supplementary Planning Guidance to support the Local Development Plan.
- Endorse the recommended Article 4 Directions (an Article 4 Direction removes certain permitted development rights) and agree for the consultation process to commence¹;

Author Planning Policy Manager

Ward Stow Hill, Caerleon, Gaer and Allt-Yr-Yn

Summary Four Conservation Area Appraisals have been drafted for the following areas:

- | | |
|-------------------|---------------|
| I. Clytha | III. Caerleon |
| II. The Shrubbery | IV. Stow Park |

Each appraisal has been through an 8-week public consultation, including a public meeting that outlined the significance of each area, the proposed boundary alterations and recommendations for future management; including the use of Article 4 Directions. Comments have been received and the Council has made a number of amendments. It is now proposed that the boundary changes and appraisal documents are formally endorsed by the Council. A separate legal process will then commence in order to get the Conservation Areas formally amended and the Article 4 Direction introduced. On completion of this process, the Council will then adopt the four Conservation Area Appraisals as Supplementary Planning Guidance (SPG). All affected properties have been kept informed of the progress to date, and will be informed on completion, included properties now within a Conservation Area and also those which were part of a Conservation Area but are no longer.

Proposal That Cabinet Member:

- Notes the comments received during the consultation of the four Conservation Area Appraisals;

¹ The process of setting up an Article 4 Direction involves an additional consultation. The responses will be reported to Cabinet Member as part of a separate report.

- Approves the proposed responses and changes to the documents/boundaries and endorses the four Conservation Area Appraisals;
- Agree that the formal legal process to amend the Conservation Areas can proceed;
- Once the legal process has formally concluded, agree that the Council will adopt the four Conservation Areas Appraisals as Supplementary Planning Guidance to support the Local Development Plan.
- Endorse the recommended Article 4 Directions and agree for the consultation process to commence.

Action by Head of Regeneration, Investment and Housing

Timetable Immediate

This report was prepared after consultation with:

- Strategic Director - Place
- Head of Law and Regulations – Monitoring Officer
- Head of Finance – Chief Finance Officer
- Head of People and Business Change
- Head of Regeneration, Investment and Housing
- Internal Council Departments
- General Public

Signed

Background

The Planning (Listed Building and Conservation Areas) Act 1990 requires Local Authorities to review their Conservation Areas in a timely manner. There are fifteen Conservation Areas within Newport, and four of them have been identified as needing refreshment. Conservation Area Appraisals have been created from the following areas:

- City Centre Conservation Area
- St Woolos Conservation Area
- Clytha Conservation Area
- Caerleon Conservation Area
- The Shrubbery Conservation Area
- Stow Park Conservation Area

The draft appraisals (see background documents for full details) were all subject to an 8-week public consultation, along with four public meetings, which were undertaken in two phases.

Phases	Public Consultation	Public Meetings
1- City Centre, St Woolos, Clytha	8 June 2018 – 3 August 2018	Sat 16 June 2018 Newport Market Thurs 21 June 2018 Civic Centre
2- Caerleon, Stow Park, The Shrubbery	26 October 2018 – 21 December 2018	Wed 7 Nov 2018 Civic Centre Mon 12 Nov 2018 Caerleon Town Hall

A total of 18 comments have been received and considered by officers. These came from local residents, a local member, a neighbouring authority, City Services, a developer and local interest groups. The tables noting all comments received and the Council's proposed responses are available to view in Appendix 1. A summary of the subsequent proposed changes to the Appraisals are set out below.

Following the consultation period, the Council has commissioned work on a City Centre Masterplan. Due to the interrelationship between this new work and the City Centre and St Woolos Conservation Area Appraisals, it is considered appropriate to postpone the final adoption of these two appraisals to ensure all plans that affect the City Centre are undertaken in a comprehensive manner. The consultation responses have been reported for information purposes only.

Summary of Comments and Proposed Changes

Each of the appraisals follow a set format that creates a consistent and easy to use format for all stakeholders. The documents have been updated to reflect post consultation alterations, including the new boundaries. A separate document has been prepared as a record outlining the process of boundary alteration (see section 3). There were no significant changes to the documents post consultation with the exception of reinstating the field to the South of the Amphitheatre ('Site A') within the Caerleon Conservation Area.

Overarching Comments

There was support for the appraisal process and a clear understanding by the vast majority of respondents of the value of the areas in which they occupy or hold an interest. There was a clear message particularly from local residents of the economic implications of having to comply with Conservation Area designation e.g. such as replacing windows with timber, treeworks or the use of natural slates. There was a clear understanding as to why these controls are in place, but residents noted that financial support from the Council would certainly assist those with a will but limited finances. It is understood that a grant scheme for such support could be provided within the Council, but there are no plans to introduce such as scheme due to other financial pressures. Consultation response also mentioned the Council's role with regard to ensuring appropriate streetscene furniture, street markings/repairs etc.

City Centre Conservation Area Appraisal (for information only)

There were no objections to the appraisal or proposed boundary alterations. There were two comments received outlining small amendments for clarification and general support for the process. They included support for identifying the value of archaeology within these areas and the support for high quality uncluttered streetscene but the need to consider financial implications and long term maintenance. Both comments are repeated to each of the six Conservation Area appraisals.

St Woolos Conservation Area Appraisal (for information only)

There was one objection to the identification of The Church House (109-111 Stow Hill) as a positive contributor. The comments deem the property to be a detracting feature and identify it as an opportunity for enhancement. It is considered that the property is worthy of identification as a positive contributor by virtue of its age, historical use and continued presence on an important thoroughfare. Importantly it is considered that its identification as a positive contributor does not preclude opportunities for enhancement and therefore remains as a positive contributor. There were no other objections to the appraisal or proposed boundary alterations.

Clytha Conservation Area Appraisal

There were no objections to the appraisal or proposed boundary alterations. A local resident did make comments reiterating the problems in the area with litter, drainage, lack of street cleaning and parking which has been recognised in the appraisal. The management plan section of the documents seeks to highlight the value of the area to owner/occupiers in order to install pride and encouraging the need for general maintenance and proposes opportunities for enhancement.

The document has been updated to reflect the proposed boundary changes. The updated document is available below:

- [Clytha Conservation Area Appraisal \(2019\) \(pdf\)](#)

Caerleon Conservation Area Appraisal

There were five formal objections received on the proposed removal of the fields to the south of the amphitheatre ('Site A') from the Conservation Area. The point was made that the area was worthy of designation and provided the Council with future control. On balance it is proposed that the area remain within the Conservation Area due to the level of response, the value clearly placed on this area and the fact that its continued designation does not cause conflict. Two further comments were received to further extend the area towards Christchurch. The historic value of this area is understood, however it is considered that such a designation is not suitable for such predominantly natural landscapes.

The Civic Society were pleased with the level of engagement they and local residents received. It was noted that due to the pressures on Caerleon, reappraisal should take place on a five yearly basis. There is no commitment from the Council for a timescale of formal review and resource implications would make this request difficult to commit to.

A key message from two respondents was on the importance of co-working e.g. developing a public realm/interpretation improvement plan with the Council and other interested parties i.e. Cadw, to link to future funding streams. A cooperative approach to the positive management and enhancement of the Conservation Area is to be supported and that the Council would look to support local initiatives where possible.

There was a comment from a local resident who felt that Caerleon has been neglected by the Council in terms of traffic, air pollution, deterioration of the high school etc. It was felt that resources would be better spent to solve these problems rather than using consultants to undertake such appraisals. It is noted that the Council has a duty to review their Conservation Areas and external consultants were utilised via the

procurement process which means the best value for money has been sought and in this instance due to limited internal resources.

The document has been updated to reflect the proposed boundary changes that were consulting upon, however 'Site A' has now been included following the public response to the consultation. The views from the Millennium Garden and Tennyson's view as suggested through the consultation process are also included within the appraisal. The updated document is available below:

- [Caerleon Conservation Area Appraisal \(2019\) \(pdf\)](#)

The Shrubbery Conservation Area Appraisal

There were no objections to the appraisal or proposed boundary alterations. Comments from two local residents note the poor quality and inappropriate development permitted by the Council in the past to the detriment of the Conservation Area, noted as being permitted against the recommendation of the Conservation Officer of the Council. It is noted that each application for development is appraised on its own merit with a clear policy objective not to detract from the character of the Conservation Area. In addition, the comments noted that the unadopted status of Westfield and Parkfield Place does not absolve the Council from its responsibilities such as street lighting and drainage. Our Streetscene section has confirmed that these roads have the status as 'highways not maintainable at public expense', that is, the Council is not under any legal obligation to maintain them or provide street lighting. It is understood that such responsibility lies with those whose properties adjoin it.

The document has been updated to reflect the proposed boundary changes. The updated document is available below:

- [The Shrubbery Conservation Area Appraisal \(2019\) \(pdf\)](#)

Stow Park Conservation Area Appraisal

There were no objections to the appraisal or proposed boundary alterations. Some small points of correction to plans and clarification of text were provided on issues such as the incorrect Registered Park and Garden boundary or clarifying when management proposals such as introducing an Article 4 direction would be made. These points have been updated in the final version of the appraisal. There were two specific objections to the text which have subsequently been amended. The first was the lack of understanding of socio-economic circumstances and the wording of objective for 'the highest quality' repair illustrated this. The text has been amended to read that the 'repair should be of high quality' to reflect an understanding of such circumstances. The other is a description of a set of steel ties to the corner of Caerau Crescent, this has been described as 'highly distracting' but is now 'a significant distraction'.

A respondent noted that The Well Being and Future Generations Act and the responsibility to take into account Climate Change, specifically the need to find solutions to reducing sources of home energy loss and cost. It is considered that the purpose of this guidance is to set out the characteristics of the conservation area and set out management objectives for its preservation and enhancement. The need to manage climate change is a topic that affects our built environment and the appraisal does not restrict such proposals within these areas. They would be encouraged as long as they meet the requirement to preserve or enhance the character of the Conservation Area.

One resident highlighted the Council's continued responsibilities to the Conservation Area siting the need to provide bespoke technical guidance, understand the impact of closing a residential home which has subsequently been left vacant, removing litter bins and the subsequent increase in litter to the area etc. The key here is collaboration and the perceived lack of it to date. It is clear that the Council's Conservation Officer and Tree Officer are available for advice and support but it should be understood that it is not their role to provide specifications for works but to assess their impact and suitability.

The timescale for implementation of the management objectives of the appraisal was raised. It should be noted that the proposed improvements set out within the management plan are not matched with resources and have been identified as potential future opportunities. It is predominantly in the gift of the landowners and occupiers to undertake the management proposals and the Council will look to support this where relevant.

The document has been updated to reflect those corrections and objections received as well as the proposed boundary changes. The updated document is available below:

- [Stow Park Conservation Area Appraisal \(2019\) \(pdf\)](#)

Proposed Boundary Changes

Each of the adopted Conservation Area Appraisals will only show the final version of the adopted boundary to avoid confusion with the existing and proposed boundaries. It is however important to keep a record of the amendments and individual short papers have been prepared to record these changes. There are available to view via the links below and will be made available on the Council's website:

- I. [Caerleon Conservation Area 2019 Boundary Amendment Report \(pdf\)](#)
- II. [Clytha Conservation Area 2019 Boundary Amendment Report \(pdf\)](#)
- III. [The Shrubbery Conservation Area 2019 Boundary Amendment Report \(pdf\)](#)
- IV. [Stow Park Conservation Area 2019 Boundary Amendment Report \(pdf\)](#)

Next Steps

In order to get the Conservation Areas legally amended, the following has to occur:

- Notice shall be given to the Welsh Ministers;
- Notice shall be placed in the London Gazette and a local newspaper;
- A local land charge will be placed on each property or removed as necessary;
- Details of each Conservation Area shall be sent to the Historic Environment Record;
- Information on each Conservation Area and a note on what designation means will be made available by means of the Council's website; and
- A summary of the consultation process and the responses should be included with the appraisal and management plan. A copy of this report will be made available on the website for this purpose.

On the conclusion of the legal process to amend the boundaries, the Council will adopt the four Conservation Area Appraisals as Supplementary Planning Guidance.

Article 4 Directions

An Article 4 Direction for the preservation of a Conservation Area is something that only the Council can implement. An Article 4 Direction would remove specific permitted development rights from residential properties. The Conservation Area Appraisals identify areas where this would be suitable due to the incremental alterations being seen that will eventually lead to the total loss of character. The Council currently has one Article 4 Direction in place affecting the Lower Dock Street Conservation Area.

Conservation Area designations as they stand introduce some restrictions on permitted development rights but in some circumstances, local planning authorities may identify a need to use Article 4 Directions which introduce a requirement for planning permission. This enables the impacts of development to be properly considered and can help prevent the erosion of character. For example, Article 4 Directions could be used to help manage small-scale changes which would have little effect individually, but cumulatively could affect the appearance or character of a conservation area.

It is proposed that Article 4(2) of the General Permitted Development Order 1995 is enabled by the local authority in the following Conservation Areas:

- The Shrubbery
- Caerleon
- Stow Park

A draft Direction, setting out those works which will require planning permission once an Article 4 Direction has been served, is set out in Appendix 2. Those works that will require permission include replacement, new or amended: windows, external doors, roof coverings, boundaries, render and painting.

Article 4(2) Directions apply to domestic buildings and structures, but only to those parts that front onto highways, waterways or open spaces. They can be confirmed by local authorities once the direction has been advertised locally and notice served on residents. The conservation area appraisals provide a robust evidence base on which we have assessed the need and scope for Article 4 Directions. There is no formal right of appeal against the making of an Article 4(2) Direction. The confirmed Article 4(2) Direction will remain valid unless it is cancelled. The making of the Direction will be registered as a land charge against the individual properties affected.

It is considered that due to the predominance of flats within the Clytha Conservation Area an Article 4 direction is not required. This is due to the fact that flats do not have the permitted development rights that we would seek to remove through the Article 4 Direction.

Therefore, it is proposed that, following the legal boundary changes and adoption of the Appraisals as supplementary planning guidance, the following process is undertaken for the progression of Article 4 directions:

- Place a notice in local newspaper;
- Serve notice to all affected properties, including an easy to understand guide on the implications (providing a period of at least 21 days to provide comment);
- Consider representations and report back to Cabinet Member;
- After a period, of no less than 28 days and no more than 6 months, confirm the Direction to all affected.

Financial Summary

There was a small financial cost associated with the consultation, mainly the cost of advertising in the South Wales Argus and the cost of sending letters to all affected properties. There will be additional costs associated with making sure all affected properties are informed and further advertising within the London Gazette and South Wales Argus. However, there will be no cost associated with adoption. Following adoption, it might be desirable to print hard copies of the SPG as office copies, but this will be a modest fee. The majority of users will download the SPGs electronically from the Council website. The further costs associated with this work will be covered by the Local Development Plan budget.

Risks

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
Not meeting legislative requirement, The Planning (Listed Building and Conservation Areas) Act 1990	L	L	These Appraisals have been prepared to meet these legal requirements.	Development & Regeneration Manager/Planning Policy Manager

s69&71, to undertake Conservation Area Reviews				
Clarity on the LDP policies is not provided and the LDP could be left open to interpretation and planning decisions are open to challenge.	L	L	These SPGs have been prepared to add clarity and guidance on LDP policies to aid the planning application determination process.	Development & Regeneration Manager/Planning Policy Manager
Potential for compensation with introduction of Article 4(2) direction	L	L	The right to claim compensation is hedged with certain restrictions and would relate directly to the impact on capital value of the property. The direction would have limited impact on capital value and is therefore considered low risk.	Development & Regeneration Manager/Planning Policy Manager & Head of Law and Regulation

Links to Council Policies and Priorities

The Local Development Plan is one of the statutory plans the Council has to prepare. It determines Newport's land use policies to 2026. The SPGs will supplement and support the overarching principles set out in the LDP, adding more detail and clarification where required.

Newport City Council has a Corporate Plan that runs to 2022. Its primary objective is 'improving people's lives'. It has four commitments; Resilient Communities, Thriving Cities, Modernised Council; and Aspirational People. The SPGs will help deliver these commitments by ensuring development is undertaken which preserve and enhances the special character of the Conservation Areas which will build upon our cultural capital as well as provide positive and attractive spaces to work, live and visit.

Options Available and Considered

- A. Endorse the boundary changes and Conservation Area Appraisals and adopt the documents as SPG once they have been legally approved. Then approve the consultation for the Article 4s.
- B. Make modifications to the boundaries of the Conservation Areas and modifications to the Appraisals.
- C. Do not endorse the boundary changes and Conservation Area Appraisals.
- D. Endorse the boundary changes and Conservation Area Appraisals and adopt the documents as SPG once they have been legally approved. Do **NOT** approve the proposed Article 4s consultation.

Preferred Option and Why

The preferred option is Option A. The documents have been subjected to public consultation and comments have been considered and in some instances, amendments have been made to the documents. The boundaries now follow a considered and updated reflection of the heritage value of each area. The next steps allow this work to be formalised and at least one management objective i.e. Article 4 Direction, to be implemented for the benefit of these areas. In addition, adopted SPGs will assist the Council in determining planning applications.

Comments of Chief Financial Officer

There are minimal costs in terms of communication and advertising associated with this proposal which will be met from existing budgets. Any further unforeseen costs as a result of the adoption would be met from the Local Development Plan budget.

Comments of Monitoring Officer

Under the Planning (Listed Buildings and Conservation Areas) Act 1990 the local planning authority has to determine which parts of its area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance and then shall designate those areas as conservation areas. There is an ongoing duty to review the past exercise of these powers and to formulate and publish proposals for the preservation and enhancement of any conservation areas. Any such proposals must be submitted for consideration at a public meeting and regard must be had to any views expressed at such a meeting. This procedure has been complied with and the views expressed have been considered and are set out in this report. The Act requires that the designation of a new conservation area will need to be advertised in the London Gazette, a local newspaper and registered as a local land charge.

In addition to designating an area as a Conservation Area the Council has the additional power to serve an Article 4(2) Direction under the Town and Country Planning (General Permitted Development) Order 1995. Welsh Government Circulars provide guidance on the use of Article 4(2) Directions and the procedure for making and confirming them. A direction under the Article 4(2) restricts the scope of the permitted development rights in relation to a Conservation Area. The effect of the Article 4 Direction is that previously authorised development would require planning permission. The direction must be subject to at least 21 days consultation, but does not need approval from the Welsh Ministers. Unless confirmed by the LPA, a direction under Article 4(2) expires at the end of 6 months from the date it was made.

The local planning authority can be liable to pay compensation to those whose permitted development rights have been withdrawn, but only if it then subsequently:

- refuses planning permission for development which would otherwise have been permitted development; or
- grants planning permission subject to more limiting conditions than the General Permitted Development Order.

The grounds on which compensation can be claimed are limited to abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights.

Comments of Head of People and Business Change

As required, this report has fully considered the Well-being of Future Generations (Wales) Act 2015. This proposal supports a many of the Well-being Goals and the Council Well-being Objectives. All aspects of the Act's sustainable development principle, "*looking to the long term*", "*involving people*", "*collaborating with others*", "*taking an integrated approach*" and "*prevention*" have been fully covered in this report.

There is no requirement for a separate Equalities Impact Assessment (EIA) as mentioned in the appropriate section of the report.

Finally, from an HR perspective, there are no staffing implications.

Comments of Cabinet Member

Cabinet Member has been briefed.

Local issues

The Appraisals will directly affect those designated Conservation Areas in the Caerleon, Stow Hill, Allt Yr Yn and Gaer wards.

Scrutiny Committees

The SPGs have not been through are Scrutiny Committees.

Equalities Impact Assessment and the Equalities Act 2010

The LDP as a whole has been subjected to an Equalities Impact Assessment. The Appraisals are to be adopted as SPGs which supplement the LDP. It is not considered necessary to have separate EIAs for every SPG.

Children and Families (Wales) Measure

No consultation has taken place specifically with children and young people. Children and young people were eligible to comment on the Appraisals during the formal 8-week consultation. The subject areas of the Appraisals are not considered to be particularly relevant to children and young people.

Wellbeing of Future Generations (Wales) Act 2015

The Well-being and Future Generations (Wales) Act seeks to improve the social, economic environmental and cultural well-being of Wales. Public bodies should ensure that decisions take into account the impact they could have on people living in Wales, in the future. The 5 main considerations are:

- Long term: This work aims to provide those persons who occupy or hold an interest in one of the four Conservation Areas with a clear understanding of the character and significance of each area and in turn the cultural value of their locality. This work also provides management objectives on how to maintain this significance and value for the future.
- Prevention: The understanding and subsequent initiation of management proposals and developments reflecting the special character of the area will prevent the loss of these high valuable local assets. Early consideration of these aspects will ensure future generations can appreciate the value of their heritage.
- Integration: Improving the understanding of local level heritage designations will help integrate sustainable repairs and developments into the psyche of developers and the community. This in turn will make developments more attractive to residents and the community. The adoption of these documents will help interested parties understand their role in respecting and fulfilling their legislative role in preserving and enhancing Conservation Areas. Overall the process and guidance will meet the seven well-being goals. In particular the work will conserve local culture and provide a sense of pride in a local area, which can be linked to the specific goals of a Wales of vibrant culture and thriving Welsh Language and A healthier Wales. The sense of community achieved through a collective understanding of the value of a space will help towards creating cohesive communities and a more equal community where the value is shared. Heritage is clearly linked to regeneration benefits and the value of properties within a conservation area is well known and is therefore contributing towards a prosperous Wales. The protecting of property with inherent carbon value, providing a framework to allow renewable energy projects where possible whilst protecting heritage value and the protection of trees and hedgerows also goes towards meeting the goals of creating a resilient Wales and a globally responsible Wales.
- Collaboration: These four appraisals have been through 8 weeks of public consultation on the draft documents. These consultation periods also included four public exhibitions and a presentation to a local civic society. All of these events were publicised on the Council's website and letters sent to all addresses affected. The consultation has informed the final version and allows collaboration between those interested stakeholders.
- Involvement: There was a meaningful response to the consultation process. The public events saw an attendance rate of approximately 95 persons. The consultation has informed the final

version of the documents. Their involvement was key to producing a useful document that can be used to preserve and enhance the four Conservation Areas.

The proposal is in line with the Council's well-being objectives published in March 2017. Specifically, these proposals contribute to the well-being objectives to promote economic growth and regeneration whilst protecting the environment.

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. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the adoption of these documents.

Consultation

Extensive public consultation has taken place and comments have been received from interested parties. Consultation has also taken place within the Council, particularly with Streetscene.

Background Papers

Draft Conservation Area Appraisals for:

- [Caerleon Conservation Area](#) (pdf)
- [Stow Park Conservation Area](#)(pdf)
- [Clytha Conservation Area](#)(pdf)
- [City Centre Conservation Area](#)(pdf)
- [St Woolos Conservation Area](#)(pdf)
- [The Shrubbery](#)(pdf)

Dated: 15 January 2020

APPENDIX 1 –

COMMENTS RECEIVED ON THE INITIAL CONSERVATION AREA APPRAISAL AND THE COUNCIL'S PROPOSED RESPONSE

Representor	Comments	Council Response
Cardiff City Council	While we do not have any specific comments to make, we commend your approach and consider that the documents are comprehensive, easy to navigate, and clearly laid out covering the history, architectural quality and design significance of each conservation area. The language used is clear and succinctly summaries the features and buildings that positively contribute or detract from each area's character and appearance.	Comments noted and welcomed.

COMMENTS RECEIVED ON THE CITY CENTRE CONSERVATION AREA APPRAISAL AND THE COUNCIL'S PROPOSED RESPONSE

Representor	Comments	Council Response
Newport Streetscene	3.7.3 This is Indian Lapis and York Stone. Not Pennant	Alter to Indian Lapis or appropriate stone
	5.4.2 (1) As highway authority, Newport City Council has a duty to maintain the highway. In accordance with the highway risk management, interim repairs will be carried out to maintain the safety and serviceability of the surfaces. The materials used in these urgent repairs will not necessarily be consistent with the existing pallet of materials. Reinstatement of the repairs in appropriate pallet materials will be undertaken within 6 months. This also applies to statutory undertakers and accords with current Codes of Practice	The immediacy of repairs is noted and understood, so too the timescale within which appropriate materials should be reinstated.
	5.4.2 (5) All parking enforcement powers currently rest with Gwent Police. However, Council has decided to apply for Civil Parking Enforcement Powers in 2019. Enforcement of traffic contraventions will then fall to the Council but Moving traffic offences will remain with the Police to enforce. Enforcement will be undertaken commensurate to the available resources.	The potential alteration in parking enforcement is noted so will remain as a recommended objective.
	5.4.2 (6) Streetscene would endorse any plans you are considering to control the placing of advertisement on any highway infrastructure.	Support welcomed
	5.4.2 (9) High quality public realm is supported but any design must consider the maintainability and revenue costs to the Council	Support welcomed and cost implications noted.
	5.4.2(10) This is a measure that cannot be supported as it will impact heavily on Streetscene in maintaining the highway asset. Any decision to take this forward must also be fully consulted on and taken to Welsh HAUC due to its impact on statutory undertakers works	The wording of "due consideration" is considered appropriate; as if there are deeper works proposed then that may have an impact that may require mitigation. In other ASAs the LPA has

		<p>consulted us regarding impact on proposals for telecoms boxes, etc. as these have encountered finds, and in some cases features of prehistoric Roman and Medieval date.</p>
GGAT	<p>Thank you for consulting us on these draft Conservation Area Appraisals, and we welcome the revisiting and reconsideration of these areas.</p> <p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for South East Wales.</p> <p>The drafts, particularly for the City Centre and St Woolos, acknowledge the value and highlight the likelihood of archaeological remains within the Conservation Areas. The importance of the origins of Newport in maritime transport and trading, as well as early settlement of both religious and secular nature is recognised. These have contributed to the form and layout of the city and environs. As noted in the drafts, examination of historic mapping has shown that settlement and land use has changed over the centuries and recognition of the reasons for this allows better identification and interpretation of the historic assets, archaeological resource and built heritage. The development, restoration or change relating to areas or properties within these Conservation Areas may have archaeological issues that may require mitigation.</p> <p>The drafts note process for identification of risk to the Conservations Areas and also identification of opportunities for their enhancement and protection. This will also, in parts of the areas, identify the same for the historic environment and buried archaeological resource, this also should be recognised as another allied benefit. The management of all these areas, and the impact of development, or changes to them, needs to be managed and mitigated in line with current Welsh Government Policy, Chapter 6 of Planning Policy Wales, Conserving the Historic Environment, TAN24: The Historic Environment; and supporting Best Practice Guidance. Proposed changes can affect standing structures, as well as buried archaeological remains, and these can be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p>	<p>Comments noted and welcomed.</p> <p>Within section concerning opportunities for their enhancement and protection. Note that identifying risk is also a benefit to buried archaeological resource.</p> <p>The specific requirements of undertaking archaeological assessment etc. should be defined at a case by case basis. The use of competent persons when undertaking archaeological works is supported.</p>

	<p>It is important to recognise that Planning Policy Wales refers to archaeological sites, including historic assets, being preserved in situ as a priority, and preserved by record if their preservation in situ cannot be achieved.</p> <p>All archaeological work, including that undertaken to assess change in sensitive habitats which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the ClfA or by a MCIfA level member. These professional organisations are experienced in working alongside other professions where archaeology is a consideration with other matters.</p>	
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COMMENTS RECEIVED ON THE ST WOOLOS CONSERVATION AREA APPRAISAL AND THE COUNCIL’S PROPOSED RESPONSE

Representor	Comments	Council Response
Newport Streetscene	5.4.2 High quality public realm is supported but any design must consider the maintainability and revenue costs to the Council	Support welcomed and cost implications noted.
	5.4.2 (1) As highway authority, Newport City Council has a duty to maintain the highway. In accordance with the highway risk management, interim repairs will be carried out to maintain the safety and serviceability of the surfaces. The materials used in these urgent repairs will not necessarily be consistent with the existing pallet of materials. Reinstatement of the repairs in appropriate pallet materials will be undertaken within 6 months. This also applies to statutory undertakers and accords with current Codes of Practice	The immediacy of repairs is noted and understood, so too the timescale within which appropriate materials should be reinstated.
	5.4.2 (6) High quality public realm is supported but any design must consider the maintainability and revenue costs to the Council	Support welcomed and cost implications noted.
	5.4.2 (7) This is a measure that cannot be supported as it will impact heavily on Streetscene in maintaining the highway asset. Any decision to take this forward must also be fully consulted on and taken to Welsh HAUC due to its impact on statutory undertakers works	The wording of “due consideration” is considered to be appropriate, as if there are deeper works proposed then that may have an impact that may require mitigation. In other ASAs the LPA has consulted us regarding impact on proposals for telecoms boxes, etc. as these have encountered finds, and in some cases features, of prehistoric, Roman and Medieval date.

<p>GVA Grimley on behalf of Linc Cymru & The Church of Wales,</p>	<p>We are writing to you on behalf of our clients, Linc Cymru & The Church of Wales, in respect of the current consultation exercise being carried out by Newport City Council (NCC) inviting comments on the draft Conservation Area Appraisal (CAA) of St Woolos.</p> <p>Our clients have an interest in The Church House (109 – 111 Stow Hill), which is located within the St Woolos Conservation Area, the extent of which is shown on the enclosed site location plan. Accordingly, this representation is made in respect of that building.</p> <p>The draft CAA identifies The Church House as a ‘positive contributor’ to the conservation area. We contest this status, our justification for which is detailed within this letter that should be read in conjunction with the enclosed report prepared by Austin-Smith:Lord LLP.</p> <p>Site Context</p> <p>The Church House occupies an irregular shaped parcel of land measuring 0.04 hectares. The building itself is three storeys in height and was formerly operated as a public house.</p> <p>The property terminates the terraced row that fronts Stow Hill, although the frontage is staggered and, therefore, the building breaks the rhythm of the row. The existing building occupies the majority of the site, although there is a small yard extending to the rear towards the adjacent residential properties that front Dewsland Park Road. There are several Grade I and II listed buildings in the proximity of the site off Clifton Place and Stow Hill; most notably St Woolos Cathedral, which is directly opposite. The Church House itself is not listed.</p> <p>Assessment</p> <p>The draft CAA has been prepared to record and analyse the character and special interest of the St Woolos Conservation Area, particularly by recognising designated and non-designated heritage assets. This draft document also seeks to identify risks and opportunities to inform a management plan for the preservation and enhancement of the conservation area.</p> <p>Appendix A of the draft CAA provides a list of heritage assets. As part of this list, the status of The Church House is noted to be a positive contributor, which is defined under paragraph 4.2.7 as a “... <i>structure or feature which beneficially adds to the overall character of its local area.</i>”</p> <p>The draft CAA goes on to state that “<i>the extent to which a building will positively contribute will largely depend on the integrity of its historic form and is not restricted to its principal elevation; for example, roofscapes and side/rear elevations can all make a positive contribution.</i>”</p> <p>The draft CAA notes there are five criteria for identifying positive contributors, these are:</p>	<p>The former pub has an important historical use and is located in a prominent position on a highly significant thoroughfare: the increased footfall on Stow Hill prior to the creation of Commercial Street would have warranted a high number of patrons seeking rest and refreshment on their way into/out from the town centre (especially before the advent of clean drinking water). The building pre-dates the terrace immediately to the west and is documented in its surviving unusual configuration in the 1883-84 Ordnance Survey. It is therefore considered a positive contributor by virtue of its age, historical use and continued presence on an important thoroughfare. This does not preclude opportunities for enhancement.</p>
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	<ul style="list-style-type: none"> <input type="checkbox"/> Association with notable architects or other historical figures; <input type="checkbox"/> Position and presence within the streetscape; <input type="checkbox"/> Use of characteristic materials, architectural motifs or detailing; <input type="checkbox"/> Relationship with neighbouring buildings, physical and historical, and <input type="checkbox"/> Historical uses. <p>The accompanying report from Austin-Smith:Lord makes an assessment of The Church House in respect of each of these criteria. As such, we will not revisit these specific comments here. Although we note The Church House occupies an end of terrace position fronting onto Stow Hill, which comprises a variety of late 19th / early 20th century architectural styles, designs and scale of building. The rhythm and proportion of this particular terraced row is not continued across the front of The Church House, therefore creating an awkward discontinuation of the terrace. Moreover, there appears to have been little care shown in the design of the building, which has limited architectural expression and fails to clearly recognise and address the importance of its position in relation to the Grade I listed St Woolos Cathedral. The Church House offers little architectural value, and indeed includes many of the detracting features identified at paragraph 4.3.6 (Detracting Features) of the draft CAA. In view of this and given the building is not protected by virtue of listing, the building does not warrant the status of a 'positive contributor'. Instead, the building and its curtilage represent an opportunity for enhancement; the scope of which will be discussed with the Council as part of pre-application dialogue.</p> <p>Summary</p> <p>This representation has been made by GVA and Austin-Smith:Lord, on behalf of Linc Cymru and The Church of Wales, in response to the Council's consultation exercise inviting comments on the draft CAA of St Woolos.</p> <p>In summary, the building detracts from the character and appearance of the conservation area. It is on this basis, we respectfully request the draft CAA is amended to reflect the fact The Church House does not beneficially add to the overall character of the local area and is, therefore, not a positive contributor to the St Woolos Conservation Area.</p>	
GGAT	<p>Thank you for consulting us on these draft Conservation Area Appraisals, and we welcome the revisiting and reconsideration of these areas.</p> <p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the</p>	<p>Comments noted and welcomed.</p> <p>Within section concerning opportunities for their enhancement and protection. Note that identifying risk is also a benefit to buried archaeological resource.</p>

Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales.

The drafts, particularly for the City Centre and St Woolos, acknowledge the value and highlight the likelihood of archaeological remains within the Conservation Areas. The importance of the origins of Newport in maritime transport and trading, as well as early settlement of both religious and secular nature is recognised. These have contributed to the form and layout of the city and environs. As noted in the drafts, examination of historic mapping has shown that settlement and land use has changed over the centuries and recognition of the reasons for this allows better identification and interpretation of the historic assets, archaeological resource and built heritage. The development, restoration or change relating to areas or properties within these Conservation Areas may have archaeological issues that may require mitigation.

The drafts note process for identification of risk to the Conservations Areas and also identification of opportunities for their enhancement and protection. This will also, in parts of the areas, identify the same for the historic environment and buried archaeological resource, this also should be recognised as another allied benefit. The management of all these areas, and the impact of development, or changes to them, needs to be managed and mitigated in line with current Welsh Government Policy, Chapter 6 of Planning Policy Wales, Conserving the Historic Environment, TAN24: The Historic Environment; and supporting Best Practice Guidance. Proposed changes can affect standing structures, as well as buried archaeological remains, and these can be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.

It is important to recognise that Planning Policy Wales refers to archaeological sites, including historic assets, being preserved in situ as a priority, and preserved by record if their preservation in situ cannot be achieved.

All archaeological work, including that undertaken to assess change in sensitive habitats which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the CfA or by a MCIfA level member. These professional organisations are experienced in working alongside other professions where archaeology is a consideration with other matters.

The specific requirements of undertaking archaeological assessment etc. should be defined at a case by case basis. The use of competent persons when undertaking archaeological works is supported.

COMMENTS RECEIVED ON THE CLYTHA CONSERVATION AREA APPRAISAL AND THE COUNCIL'S PROPOSED RESPONSE

Representor	Comments	Council Response
Local Resident	<p>Dear sir/madam I have lived in Clytha Square as from 1992. I have insight into the problems this area faces. The houses are made into flats that are rented. There is no respect for how the external areas look because the owners don't care and those who rent don't care either. There is lack of accountability</p> <p>I keep the outside area clean of rubbish directly outside number 20. However, there is a general attitude (prejudice) against this area because no pride is active in its up keep. People treat it with disrespect. Litter thrown, furniture dumped, ect. The root of the problem is the owners. They need to be instructed to keep these houses in good working order so those renting can take pride in where they live. There is a general shame surrounding this area if you announce you live here; discrimination. My children grew up feeling ashamed of where they lived. However, These housing are dripping in Italian design and would look so much more elegant if all were painted the same colour. I have posted leaflets suggesting such to owners. I have asked local councillors for funding to provide hanging baskets (flowers). Such requests were not successful. If we can get some sort of community spirit and pride in where we live active the area would at least look much more cleaner. Damp in basements is a huge problem. The cost of preserving these houses is vast. My landlord is a social housing landlord and even they cant keep up with the demands this house brings. I lived in damp for 20 years before I moved upstairs into the attic flat.</p> <p>Damp in the basement remains and is not my problem anymore. The streets drains were supposed to be cleared out years ago but this do not happen. It seems to be all words and no action. The green area inside the square is a conservation area for butterflies. This area is suppose to belong to the people who live in the square to use as a garden. However, it was sold to the nursery who are slowly getting rid of numerous trees over the years to make way for more car parking spaces. They have recently killed off another tree by drilling nails into it to erect an external light. So that's another tree which will come down next time they have the tree surgeons to trim. Last year there were a family of buzzards nesting in the trees. They haven't returned.</p> <p>Car parking is abused by visitors because they gain easy access to the hospital and city centre. They dump all sorts of rubbish in recycling bins which are then not emptied via rubbish collectors due to contamination. The big green rubbish bins should have been replaced by large industrial bins allocated inside the square (trees area). This</p>	<p>Comments noted, the potential and value of the area is recognised. This document seeks to install some pride and possibly educate some owners/occupiers on the need for maintenance and the value of their properties.</p>

	<p>would have allowed the pavements to be cleared and look more pleasing to the eye. Problem is this area now belongs to the nursery. But only half? When I contact the street cleaning services via Newport.gov the street doesn't look as if it has been cleaned. It needs a good scrubbing! There should be a monthly sweep your pavement day In conclusion there seems to be a general lack of accountability amongst owners, tenants, visitors, businesses and others. I don't think Clytha square will regain her dignity until all houses are once again owned by families who want to take the time and money to invest in them. Get the owners to fork out the expense or sell up! Force them to face their accountability with high restoration demands. Unfortunately such changes my generation won't see.</p>	
Newport Streetscene	<p>3.7.3 Can you confirm the reason for this comment. Originally the carriageway would have been granite sets with wooden sets outside the hospital and tramlines along Cardiff Road. Why comment on this one asset? Feels like we are criticising previous council policy.</p>	The loss of lantern designed
	<p>5.4.2 High quality public realm is supported but any design must consider the maintainability and revenue costs to the Council</p>	Streetlamps is considered unfortunate and the reinstatement of such sensitively design street apparatus would be considered to enhance the conservation area.
	<p>5.4.2 (1) As highway authority, Newport City Council has a duty to maintain the highway. In accordance with the highway risk management, interim repairs will be carried out to maintain the safety and serviceability of the surfaces. The materials used in these urgent repairs will not necessarily be consistent with the existing pallet of materials. Reinstatement of the repairs in appropriate pallet materials will be undertaken within 6 months. This also applies to statutory undertakers and accords with current Codes of Practice</p>	Support welcomed and cost implications noted. The immediacy of repairs is noted and understood, so too the timescale within which appropriate materials should be reinstated.
	<p>5.4.2 (6) All parking enforcement powers currently rest with Gwent Police. However, Council has decided to apply for Civil Parking Enforcement Powers in 2019. Enforcement of traffic contraventions will then fall to the Council but Moving traffic offences will remain with the Police to enforce. Enforcement will be undertaken commensurate to the available resources.</p>	The potential alteration in parking enforcement is noted so will remain as a recommended objective
	<p>5.4.2 (8) High quality public realm is supported but any design must consider the maintainability and revenue costs to the Council</p>	Support welcomed and cost implications noted.
GGAT	<p>Thank you for consulting us on these draft Conservation Area Appraisals, and we welcome the revisiting and reconsideration of these areas.</p>	Comments noted and welcomed.
	<p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the</p>	<p>Within section concerning opportunities for their enhancement and protection. Note that identifying risk is also a</p>

<p>Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales.</p> <p>The drafts, particularly for the City Centre and St Woolos, acknowledge the value and highlight the likelihood of archaeological remains within the Conservation Areas. The importance of the origins of Newport in maritime transport and trading, as well as early settlement of both religious and secular nature is recognised. These have contributed to the form and layout of the city and environs. As noted in the drafts, examination of historic mapping has shown that settlement and land use has changed over the centuries and recognition of the reasons for this allows better identification and interpretation of the historic assets, archaeological resource and built heritage. The development, restoration or change relating to areas or properties within these Conservation Areas may have archaeological issues that may require mitigation.</p> <p>The drafts note process for identification of risk to the Conservations Areas and also identification of opportunities for their enhancement and protection. This will also, in parts of the areas, identify the same for the historic environment and buried archaeological resource, this also should be recognised as another allied benefit. The management of all these areas, and the impact of development, or changes to them, needs to be managed and mitigated in line with current Welsh Government Policy, Chapter 6 of Planning Policy Wales, Conserving the Historic Environment, TAN24: The Historic Environment; and supporting Best Practice Guidance. Proposed changes can affect standing structures, as well as buried archaeological remains, and these can be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p> <p>It is important to recognise that Planning Policy Wales refers to archaeological sites, including historic assets, being preserved in situ as a priority, and preserved by record if their preservation in suit cannot be achieved.</p> <p>All archaeological work, including that undertaken to assess change in sensitive habitats which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the ClfA or by a MCIfA level member. These professional organisations are experienced in working alongside other professions where archaeology is a consideration with other matters.</p>	<p>benefit to buried archaeological resource.</p> <p>The specific requirements of undertaking archaeological assessment etc. should be defined at a case by case basis. The use of competent persons when undertaking archaeological works is supported.</p>
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COMMENTS RECEIVED ON THE CAERLEON CONSERVATION AREA APPRAISAL AND THE COUNCIL'S PROPOSED RESPONSE

Representor	Comments	Council Response
Caerleon Civic Society	<p>The Caerleon Civic Society welcomes the consultation draft of the Caerleon Conservation Area Appraisal and appreciates the willingness of the City Council to brief us at an early stage about its contents and to have arranged an exhibition for the wider public. We feel that this approach to consultation brings mutual benefits and lays a good foundation for future collaborative work.</p>	<p>Your support of the consultation process is welcomed.</p>
	<p>We have the following comments:-</p> <p>Section 1. We agree with the headline description of the Caerleon Conservation Area as having a ' unique character and strong archaeological presence'. Although this description is very likely to remain relevant for years to come, we also recognise that there are very strong pressures for change, expressed through diverse factors such as land and property values and the needs of a car and lorry users, which may fundamentally alter the 'look and feel' of our Conservation Area. Because of the relentless nature of these pressures we do consider that the Conservation Area should be reappraised on a more regular basis - say, every 5 years, so that an updated Management Plan can reflect the inevitable pace of change. This review cycle should be linked to the 15 year time period of the Local Development Plan.</p>	<p>The Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to review their conservation areas from time to time to consider whether further designations or revisions are called for. There is no plan to provide a definitive review process due to the resource implications.</p>
	<p>Section 2. We consider that the Report should draw attention to the apparent vacuum in national planning guidance, and related technical advice, regarding the complex relationship between air quality and area conservation. The very high levels of air pollution being experienced in some streets within the Conservation Area are not, in our view, compatible with healthy living environments or the principles of building and area conservation. This relationship requires explicit policy guidance in terms of the Local Planning Authority dealing with individual planning applications, as the evidence of the recent Campus development proposal has shown.</p>	<p>It is considered that although poor air quality does have an impact on the built environment it is not clear how specific guidance or a policy steer on the relationship between heritage and air quality would assist. The objective here is a broader one where the improvement of air quality, particularly in areas identified as being in need of management, will make a positive impact on the environment including the built environment. Caerleon High Street and Castle Street is known to exceed the air quality objectives due to road traffic emissions, as such an air quality management area has been</p>

declared. The air quality in Caerleon is a pressing issue for us, along with other areas of the City that also exceed the air quality objective. The Council is working hard on an approach that will tackle all emissions from road traffic across the entire City. The aim is to reduce carbon dioxide emissions, improve air quality and reduce road traffic noise. No single action will solve the issue on its own, a number of actions will have to be pursued at the same time which all complement each other to reinforce the radical change required. A sustainable travel strategy has been drafted that encompasses a wide variety of actions, supporting active travel . The strategy will form the basis for detailed plans for the eleven AQMAs in the City and a public consultation will be out shortly. In the meantime, a number of actions have been actively pursued which include:

- Joining the EcoStars scheme <https://www.ecostars-uk.com/ecostars-schemes/> a free fuel economy scheme for fleet operators, the idea being less fuel burnt, more money saved, less pollution generated
- Supporting Newport City Transport in a successful bid to the Office of Low Emission Vehicles for electric buses
- Supplementary Planning Guidance for Air Quality
- Funding Applications to support Active Travel in primary schools

		<ul style="list-style-type: none"> • Improving and expanding the cycle network across the city • Integrating sustainable travel into the Newport Well Being Plan as a priority <p>There is a lot of work that needs to be done to ensure we have a clean, efficient sustainable travel network that will benefit us all and the next generation.</p>
	<p>Section 3.</p> <p>We acknowledge the significance given in the Report to the importance of views within the Conservation Area, and to views from the Area and into it from the surrounding adjacent environment. We support the suggestion that particular views into the surrounding environment, and of the Conservation Area from that environment, should be explicitly identified and taken into account in any proposals for larger scale development in areas adjacent to the Conservation Area.</p> <p>We are particularly concerned that continued effort should be directed towards the maintenance and enhancement of public spaces and the public realm within the Conservation Area. We acknowledge that resources are limited but a more comprehensive plan of the street scene within the Conservation Area would enable available resources to be prioritised and directed more effectively. We also consider that such a plan would guide the use of any additional resources that might become available, such as Heritage Lottery Funding as mentioned in the Thurley Report, which is with Welsh Government Ministers.</p> <p>We are willing to contribute our ideas, in detail, towards this end and welcome the identification of the opportunities in section 4.3.14, onwards, of the Report. We particularly endorse the relevant section of the proposed Management Plan at section 5.3.15.</p>	<p>Support for the acknowledgement of recognition of important views is noted. The importance of public spaces and the public realm is recognised by the Council. Improvements and repairs to the streetscene must be taken in a manner which is positive and enhances and protects the character of the conservation area. Internal meetings will take place to ensure that future works and improvements are made where possible.</p>
	<p>Section 4.</p> <p>We endorse your statement of special interest and welcome your identification of positive indicators. We consider that this important section of the Appraisal can form the basis of future detailed work with property owners and developers.</p> <p>Paragraphs on condition and detracting features are more contentious. Issues will often relate to the financial resources available to individual property owners. We feel that progress in this area should not just rely on reacting to planning applications but on proactive work, perhaps with a small group of property owners, on a street-by-street basis, to discuss a more collaborative and collective approach and to receive pooled advice and guidance.</p>	<p>It should be noted that the guidance and therefore the indication of specific detracting features is intended to be broad-spanning and every instance of repair should be considered on its own merit and challenges, including whether a temporary repair is suitable to prevent further deterioration whilst a permanent solution is pending. The Council has a Conservation Officer whose role is to</p>

	<p>We particularly support the suggestion in Paragraph 4.3.17 that a high quality interpretation and way finding scheme is developed and we would wish to be involved in such a project.</p>	<p>offer advice to any interested person. If site visits are requested these are usually provided where necessary. There are no specific plans at the moment for the development of an interpretation and way finding scheme for Caerleon. It is considered important that there is clear local involvement or management of this type of scheme. This is something that will need to be considered for the future management of the area.</p>
	<p>Section 5. We are not convinced that the open field area between the amphitheatre and the river should be removed from the Conservation Area by amending the boundary. We consider that there is a distinct lack of evidence in the Report to justify this proposal, and, in particular, a lack of specific examples of sites where Scheduling, alone, has provided sufficient protection against inappropriate development. Our main objections to removal of this open area are:- * there is an overriding need to protect the views of the Conservation Area from the south. This area is integral to the principles laid out in the Report's statement of special interest. The 'unique character' of Caerleon is a combination of the developed part of the Conservation Area and the historic value of the open area to the south beyond the amphitheatre and barracks. * there are buildings and land uses within the area suggested for removal that could be the subject of large-scale development proposals and all available legislative means will be needed to ensure that such proposals are assessed properly and fully for their effect on the built part of the Conservation Area to the north. * reliance on protection under Scheduled Monument legislation may remove that all important local, democratic, dimension to decisions about future use that comes with Conservation Area designation, within the context of the Local Development Plan and its supplementary guidance.</p>	<p>The proposed removal of site 'A' -the open field between the amphitheatre and the river, is not being taken forward due to the level of response against its removal. It is clear that the Conservation Area designation is valued and does not cause any conflict therefore the area will be retained within the Conservation Area.</p>
	<p>We have no comments on the minor amendments to the Conservation Area boundary.</p> <p>We fully support the City Council in bringing forward shopfront design guidance. We support the aims and objectives set out in paragraph 5.4. We recognise, however, that a degree of incentive will be needed for both the community and individual property owners to support progress towards objectives 5,7,9 and 10. -</p>	<p>We note and welcome the support of the production of shopfront design guidance.</p> <p>The provision of a financial incentive for individual owners is something that is not currently available. It is not</p>

	<p>vegetation growth, exposure of external brickwork, colour of external paint and render, new public realm features.</p>	<p>something that can be covered in this document but will be raised as something for the Local Authority to consider to aid in the future positive management of its historic environment.</p>
Local Resident	<p>Thank you for addressing the Caerleon Civic Society meeting on 29th October with your presentation regarding the Caerleon Conservation Area Consultation.</p> <p>I am not alone in being totally against the removal of the recently discovered Roman Port land (adjacent to the Roman amphitheatre) from the Caerleon Conservation Area as it would unnecessarily take away an important local layer of protection from this internationally important historical site.</p> <p>I know CADW adds some protection but we can't know what might happen with such a national organisation.</p>	<p>The proposed removal of site 'A' - the open field between the amphitheatre and the river, is not being taken forward due to the level of response against its removal. It is clear that the Conservation Area designation is valued and does not cause any conflict therefore the area will be retained within the Conservation Area.</p>
	<p>I would also like to suggest that the conservation area be expanded to include the whole of the wooded area between the Bell Inn on Bulmore Road and Belmont Hill because of its historical importance and because it contains many protected trees - although I understand, following my research at NCC's Information Station, that the trees at the edges of the wood are not included in the protected area.</p> <p>I also recall a Celtic Manor planning application that included that side of Belmont Hill.</p> <p>This wooded area is bordered up the hill by a straight rising public footpath that skirts the downhill edge of private land containing Robinswood house before continuing up along the edge of the golf course towards Catsash Road.</p> <p>A number of coin hoards from different historic periods have been found there and it is within a Roman cemetery zone.</p> <p>The lower part of it is marked as 'Home Stall' on this 1752 plan/map, a reference, I believe, to where coach horses were kept and maintained before the invention of motorised vehicles: http://www.caerleon.net/archive/plans/1752.htm</p>	<p>The history of these areas is noted, but conservation area-designation is not appropriate for areas which are principally planted, rather than built.</p>
	<p>I also suggest that the following areas be included:</p> <p>The hollow way that runs up on the left flank of Belmont Hill from the Los Reyes Public House/Restaurant as far as Belmont House.</p>	<p>This expansion would make the conservation area extremely large and difficult to manage. There may be scope in the future to establish new</p>

<p>The Los Reyes Public House/Restaurant.</p> <p>The fields and Old Hill on the right hand side of Belmont Hill stretching across to St Julian's Park/woods and right up to Catsash Road.</p> <p>The whole of Christchurch Village and lookout area.</p> <p>They should be added for both historical/archaeological and aesthetic reasons including that they contain unimpeded views and there being potential for Roman and other remains.</p> <p>It is notable that an important Roman coffin burial was discovered at Sirona on Belmont Hill a few years ago.</p> <p>This was probably the burial mentioned on an inscribed Roman stone, discovered in the garden of Spring Grove in 1915, which is just two houses below on Belmont Hill. The stone is currently displayed in Caerleon Museum and was examined by Sir Mortimer Wheeler during the excavation of Caerleon Amphitheatre.</p> <p>Wheeler stated that the dedication was a private one in memory of a Chief Centurion (primus pilus) by one of his military colleagues who bore the cost of the stone personally.</p> <p>Belmont Hill has been a main road out of Caerleon eastward to London and westward into Wales since Roman times.</p> <p>I have been made aware, by its owner, that approaches have been made annually by the Celtic Manor Resort to purchase privately owned land within this area for development.</p> <p>I am also aware that some of this land is already owned by the CMR.</p>	<p>conservation areas which recognise the character of these additional areas.</p>
<p>Further along Bulmore Road there is land where the Usk Valley Walk rises steeply from near The Piggery towards the Celtic Manor golf course and which contains another excellent example of a hollow way to the right and wooded area to the left. I believe, for similar reasons to those stated above, that this and the whole floodplain area opposite Isca Road and the Bulmore Road, along from the Bell Inn as far as just beyond The Piggery, should also be included in the Caerleon Conservation Area. It is interesting to note that Isca Road forms a line of site from a central window of the 17th century Bell coaching inn to the famous Tennyson Window in the Hanbury</p>	<p>As above, this will make a very large area and be difficult to manage. Conservation area designation principally focuses on the built environment. The appraisal does set out those areas with important views into and out of the Conservation Area which will become part of an</p>

	Arms. This, I believe, was to enable warning signals (a precursor to traffic lights?) to be made between both public houses to prevent coaches meeting head-on along the narrow Wooden Caerleon bridge and Isca Road.	assessment of impact from a development and therefore aid in the positive management of the area.
Cllr Hughes	I would like the significant area near the amphitheatre to remain in the conservation area. My feeling is that although the area retains the strongest of protection via CADW it is important that the local authority also maintains a say in an area that is of such paramount importance historically to the Caerleon area. We do not at this time know what the future holds for CADW as a government department and it is therefore important that we as an authority can provide an additional layer of protection even if as we hope it will never be needed. As there appears to be no significant gain in removing this area it therefore I would argue make more sense to maintain this within the boundaries of the conservation area.	The proposed removal of site 'A' - the open field between the amphitheatre and the river, is not being taken forward due to the level of response against its removal. It is clear that the Conservation Area designation is valued and does not cause any conflict therefore the area will be retained within the Conservation Area.
	I would like the Local Authority to incorporate the woodland above the Bell Public House (Bullmore Road) Bemont Hill and over to the area below Christchurch into the conservation area. This would join the protected status of the Nature reserve (Christchurch) to Caerleon/Catsash. This area could be at risk of development in future and some areas within have already been subject to either planning applications or speculative enquiries. I would argue that the area is historically, aesthetically and environmentally important to the overall Caerleon experience and also incorporates the Tennyson view an area of great importance to residents and visitors to Caerleon	It should be noted that Conservation Area designation is not suitable for natural landscapes, but is intended for the built environment, therefore this area is not considered suitable for designation.
	The Tennyson View should in itself be protected as one of the great views of Wales. The view out from the Hanbury pub across the River towards Ultra Pontem and Christchurch is of significant importance and is woven in to the very fabric of Caerleon. It was in fact a significant factor in myself settling in the area. This view is a living painting appreciated by Tennyson himself and it is important we protect the vista and acknowledge its significance	The appraisal does set out those areas with important views into and out of the Conservation Area which will become part of an assessment of impact from a development and therefore aid in the positive management of the area
GGAT	<p>Thank you for consulting us on this Draft Conservation Area Appraisal, and we welcome the revisiting and reconsideration of the area.</p> <p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales. We note from the Appraisal (paragraph 3.2.3) that GGAT's HER and Archwilio are mentioned; it should be noted that</p>	The fact that GGAT's HER and Archwilio whilst being the Welsh Ministers' public interface for archaeology, is not the full record and must not be used for commercial and development purposes will be clarified in the adopted CAA.

	<p>Archwilio, whilst being the Welsh Ministers' public interface for archaeology, is not the full record and must not be used for commercial and development purposes. The Appraisal acknowledges the importance and value of archaeological remains within and outside the Conservation Area, and in the wider environment, and highlights the likelihood of potential archaeological features. The extent of the Roman fortress, and other Roman and later remains is noted, particularly those deemed to be of national importance and Scheduled as such.</p>	
	<p>The proposed change to the Conservation Area boundary, which will exclude some of the Roman remains on the river plain, is acceptable. The statutory designation as a Scheduled Monument gives more appropriate protection and the TAN 24 and Best Practice guidance provides information regarding assessing the impact on setting as well as physical impact of proposals.</p> <p>The contribution made by the early remains to the form and layout of Caerleon and its environs is noted, where deeply stratified remains of both Roman and Medieval origin define the area of the fortress, the Roman civilian settlement, cemeteries, river and maritime activity, and Roman activity within and around Ultra Pontem. We concur with the likelihood that buildings and walls of at least post-Medieval date may contain elements of Roman or Medieval masonry.</p>	<p>This area will now be retained within the conservation area following public consultation responses.</p>
	<p>Regarding management of trees, it should be noted that removal of stumps within the Caerleon area may disturb buried archaeological remains and we normally recommend that either the stump is left in situ or that removal is undertaken under archaeological supervision.</p>	<p>This note has been added to the CAA.</p>
	<p>Examination of historic mapping has shown that settlement and land use has changed and recognition of the reasons for this allows better identification and interpretation of the historic assets, archaeological resource and built heritage. The development, restoration or change relating to areas or properties within the Conservation Area may have archaeological issues that may require mitigation. The draft notes process for identification of risk to the Conservation Area and also identification of opportunities for its enhancement and protection. This will also, in parts of the area, identify the same for the historic environment and buried archaeological resource, this also should be recognised as another allied benefit. The management of all these areas, and the impact of development, or changes to them, needs to be managed and mitigated in line with current Welsh Government Policy, Chapter 6 of Planning Policy Wales, Conserving the Historic Environment, TAN24: The Historic Environment; and supporting Best Practice Guidance.</p>	<p>It is considered that the appraisal sets out the need of understanding the heritage asset and its significance when proposing a development, which includes archaeology. The requirement to consider archaeological impacts are set out in the document, as well as relevant legislation and policy. It is not considered necessary to repeat national policy in this document.</p>

	<p>Proposed changes can affect standing structures, as well as buried archaeological remains, and these can be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p> <p>It is important to recognise that Planning Policy Wales refers to archaeological sites, including historic assets, being preserved in situ as a priority, and preserved by record if their preservation in situ cannot be achieved.</p>	
	<p>All archaeological work, including that undertaken to assess change in sensitive habitats which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the ClfA or by a MCIfA level member. These professional organisations are experienced in working alongside other professions where archaeology is a consideration with other matters.</p>	<p>The specific requirements of undertaking archaeological assessment etc. should be defined at a case by case basis. The use of competent persons when undertaking archaeological works is supported.</p>
<p>Mark Lewis Senior Curator (Roman) National Roman Legion Museum</p>	<p>I write to query the 2018 proposal to reduce the size of the Caerleon conservation area beyond the amphitheatre citing Scheduled Ancient Monument status as a better mechanism for management.</p> <p>If conservation considerations merit inclusion within the conservation area in their own right, e.g. to preserve southern and western vistas from the amphitheatre (which should be shown within the proposals document, p19, plan 2, but aren't), then I would argue that the areas should remain within the conservation area. There is no guarantee that currently-scheduled ancient monuments could not be de-scheduled at a future date. Such a scenario in the scheduled areas to the south and west of Caerleon, any parts of Mm 254 & Mm 231, would negatively affect the conservation area.</p> <p>I request reconsideration of the proposed changes in this area and retention within the conservation area. Any (unlikely) future casework in these areas could be easily rationalised through good communications between Cadw and Newport Council.</p>	<p>The proposed removal of site 'A' - the open field between the amphitheatre and the river, is not being taken forward due to the level of response against its removal. It is clear that the Conservation Area designation is valued and does not cause any conflict therefore the area will be retained within the Conservation Area.</p>
	<p>Furthermore, I would request close consideration of street furniture and important architectural features in the form of fixtures and fittings.</p>	<p>Internal conversations will be held to discuss the impact of furniture and fittings on the streetscene within Conservation Areas. The impact of overly cluttered streets and poor quality</p>

		design is well understood and positive management is required.
	<p>The exposed church bell of the Roman Catholic church, which became detached through aged and failing fittings within its bellcote last year, has been lowered to safety but has not been reinstated despite Grade II listed building status. It would appear to be grossly unfair to insist on e.g. hand-made sash windows on the rear (not visible) windows of properties in High Street whilst visible important streetscape heritage is being potentially lost. A similar case may be made for the parish church lychgate right-hand pillar finial of stone, which has been detached for years. Conversely, fortunately the now-unused externally wall-mounted Charity School bell is at least still in position with its furniture and a valuably preserved part of its streetscape. Mention of the surviving Charity boundary markers may also be made.</p> <p>Re 3.7.2, any ability to rationalise the Highways and other street furniture in Caerleon, but especially on High Street around the Museum and Church, would be most welcome. The number, form and state of repair of many of these signs, lamp-posts and bollards etc. detract enormously from the character of this part of the conservation area, not least, creating a forest of modern, incongruous clutter. Stand on the Museum steps and look around. Could strategies to avoid street furniture and ridiculously outsize street lamps with no historic parallels be effected in Caerleon's 'squares', namely the Bull Inn/Post Office area, Museum/Church/School area and Goldcroft Common? The requirements for Highways signage are understood, but could they be kept outside these highly sensitive vistas, creating environmentally-inviting hubs, enhanced for greater commercial opportunity.</p>	<p>We note the removal of this item and will follow this up through the relevant process.</p> <p>The need for traditional and a minimal interventionist approach to listed buildings is a well-established conservation principle. Whether an item can be viewed from a highway is not a consideration for a listed building, it is the impact on the special character of the listed structure. This is a different test to proposed alterations in a Conservation Area where the visibility from any highway is pertinent</p>
	<p>It could also be noted that the valuable assets in the form of bronze 'Roman gateway' pavement markers need some restoration work in the form of re-filling, having decayed over time. Perhaps this could be referred to Highways, for they are becoming potential dangerous trip hazards.</p> <p>With sincere thanks for the opportunity to offer comments in support (not criticism),</p>	This issue has been referred to the streetscene section of the Council.
Local Resident	I have a few question which you asked me to put in an email. They all sound very demanding but I did not know how else to word them. sorry.	<ul style="list-style-type: none"> • An arrow notifying the important view from the millennium garden is to be added. • The park is owned by the Council.

	<ul style="list-style-type: none"> • Did you say that the millennium garden was going to have an important view arrow. • Did you find anything out about who owns or has right for the millennium garden. • Did you find out any information about the farmland being sold in the area being taken off the conservation area by the amphitheater. • Could the millennium garden be put back on the conservation area to protect it and the view. • Did you find any information out about the pumping station and what might happen to it in the future. <p>Sorry there are so many. Thank you, to you and your team for being so friendly and patient on the night.</p>	<ul style="list-style-type: none"> • The land is owned by the Council, Cadw and the owner of Broadway Farm. It is understood that the breakdown is essentially the amphitheatre land is owned by Cadw, the farm and fields directly behind White Hart lane are the farmers and the remaining large area is owned by the Council. • The millennium park has been fully included in the boundary, the previous boundary ran across the park and now the boundary is logical and follows a distinct boundary. • There are no known plans for the pumping station.
Local Resident	<p>It is my view that Newport CC has seriously neglected Caerleon through allowing over development with regard to housing, doing nothing to address massive levels of traffic pollution around the one way road system, failing to reply to residents concerns on the condition of certain listed buildings, allowing Caerleon Comprehensive School to deteriorate whilst building or improving schools in most other areas of the city and standing by offering no opposition to the closure of the University in the town.</p> <p>Extreme traffic congestion in the mornings and afternoons, accompanied by parking on double yellow lines and stopping in inappropriate places, has blighted the centre of Caerleon for many years but has never been tackled by Newport. The County Council has given such a low priority to the needs of Caerleon resulting in a most attractive town being spoilt irreparably.</p> <p>I inspected the planned proposals for the changes to the conservation area at Caerleon Town Hall and asked both the Newport representatives and those from Purcell how much the consultation was costing in total and received the same reply from both, that they could not remember. So much for transparency. From what I saw I also am sceptical about the motives to 'rationalise' the boundaries. There is in my mind ulterior motives in mind to take out a large area between the amphitheatre and the river under which there are important Roman remains including a rare villa larger in area than the amphitheatre itself. There is no need whatsoever to remove this archaeologically sensitive area from the plan. It is enclosed in the boundaries presently so why take it out?</p>	<p>Caerleon is a recognised area of much value by the Council. The area faces development pressure and the Council looks to manage this in a sustainable way. The publication of a Conservation Area Appraisal will only assist this sensitive management approach.</p> <p>Air pollution and traffic control are two such issues that the Council are aware of in Caerleon and continue to work towards a positive outcome.</p> <p>CA designation is secondary to the statutory scheduled monument status. The proposed removal of site 'A' - the open field between the amphitheatre and the river, is not being taken forward due to the level of response against its removal. It is clear that the Conservation Area designation is valued and does not cause any conflict</p>

		therefore the area will be retained within the Conservation Area.
	Money is being diverted on consultations such as this when it could be better spent on actually tackling the issues which are crucial to the everyday lives of the residents who live within the conservation area. We are choking through over development, traffic congestion and pollution. The infrastructure in Caerleon has not been able to cope with the demands put on it and a more root and branch approach is required to effect positive change, not these ineffective proposals.	The Council has a duty to review their Conservation Areas and this work has been commissioned because of the limited internal resource and for this process to be done in timely manner. The procurement process has meant that the best value for money has been sought for the project.

COMMENTS RECEIVED ON THE SHRUBBERY CONSERVATION AREA APPRAISAL AND THE COUNCIL'S PROPOSED RESPONSE

Representor	Comments	Council Response
GGAT	<p>Thank you for consulting us on these Conservation Area Appraisals, and we welcome the revisiting and reconsideration of these areas.</p> <p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales. We note from the Appraisals (paragraph 3.2.2) that GGAT HER and Archwilio are mentioned; it should be noted that Archwilio, whilst being the Welsh Ministers' public interface for archaeology, is not the full record and must not be used for commercial and development purposes.</p>	<p>The fact that GGAT's HER and Archwilio whilst being the Welsh Ministers' public interface for archaeology, is not the full record and must not be used for commercial and development purposes will be clarified in the adopted CAA</p>
	<p>The Appraisals acknowledge the value and highlight the likelihood of archaeological remains within the Conservation Areas, having a timeline noting the development of the city, although some areas in Stow Park are noted as having little archaeological interest. However, for Stow Hill, the eastern area, as noted falls within the western part of the City Centre Archaeologically Sensitive Area, and was the site of an early castle associated with the early Medieval settlement around what is now the Cathedral. The importance of the origins of Newport in maritime transport and trading, as well as early settlement of both religious and secular nature is recognised. These have contributed to the form and layout of the city and environs. As noted in the drafts, examination of historic mapping has shown that settlement and land use has changed over the centuries and recognition of the reasons for this allows better identification and interpretation of the historic assets, archaeological</p>	<p>It is considered that the appraisal sets out the need of understanding the heritage asset and its significance when proposing a development, which includes archaeology.</p>

	<p>resource and built heritage. The development, restoration or change relating to areas or properties within these Conservation Areas may have archaeological issues that may require mitigation.</p> <p>The drafts note process for identification of risk to the Conservations Areas and also identification of opportunities for their enhancement and protection. This will also, in parts of the areas, identify the same for the historic environment and buried archaeological resource, this also should be recognised as another allied benefit.</p>	
	<p>The management of all these areas, and the impact of development, or changes to them, needs to be managed and mitigated in line with current Welsh Government Policy, Chapter 6 of Planning Policy Wales, Conserving the Historic Environment, TAN24: The Historic Environment; and supporting Best Practice Guidance.</p> <p>Proposed changes can affect standing structures, as well as buried archaeological remains, and these can be mitigated by early consultation with us as your Authority’s archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p> <p>It is important to recognise that Planning Policy Wales refers to archaeological sites, including historic assets, being preserved in situ as a priority, and preserved by record if their preservation in suit cannot be achieved.</p>	<p>The requirement to consider archaeological impacts are set out in the document, as well as relevant legislation and policy. It is not considered necessary to repeat national policy in this document.</p>
	<p>All archaeological work, including that undertaken to assess change in sensitive habitats which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the ClfA or by a MClfA level member. These professional organisations are experienced in working alongside other professions where archaeology is a consideration with other matters.</p>	<p>The specific requirements of undertaking archaeological assessment etc. should be defined at a case by case basis. The use of competent persons when undertaking archaeological works is supported.</p>
<p>Local Resident</p>	<p>Thank you for alerting me to the review of the Shrubbery Conservation Area and providing the PDF of the report. I am pleased to see Newport City Council paying attention to the city’s heritage. It has not always been so.</p> <p>Most of the residents of the Shrubbery Conservation Area are aware of the heritage represented by their properties and work hard to keep them in good order. It should be borne in mind that where there are more recent buildings which are not considered an asset to the area, they are nonetheless buildings for which the Council gave planning permission and most have been designed to blend in with the original Victorian buildings in so far as possible. I note that the Council is not averse to</p>	<p>Each application will be assessed on its own merit and the council will resist proposals which will detract from the character of the conservation area.</p>

	<p>applications to build 'Honestly-modern designs of the highest quality.' (5.3.9) in the area. I hope that such developments will not be allowed and that any permanent structures, bungalows etc. will not be permitted to be constructed in gardens within the existing Conservation area.</p>	
	<p>However, the Conservation Areas of Newport are really not the most urgent heritage concern in the city. There are many fine buildings which are not being maintained and, if given some attention, would greatly add to the visitor potential and overall character of the city. Furthermore, Newport has a world class museum with excellent staff and a collection of international importance. However, the signage for the museum is so poor that many residents are unaware of its existence and because the ground floor of the building is not currently used it looks like an empty shop. The museum is a major asset to the city and should be properly supported and signposted.</p>	<p>The value of our historic environment and the positive impact this can have on economic and social environment are understood. It is agreed that opportunities should be taken to make the most of the assets Newport has.</p>
<p>Local Resident</p>	<p>My wife and I have lived in Coniston, Parkfield Place, since late 1969, 14 years before the area was designated as a Conservation Area.</p> <p>I am an architect, long since retired, but I still have a keen interest in architecture and the environment, and particularly in this local Conservation Area.</p> <p>Westfield Road and Parkfield Place are NOT Private Roads. They are Unadopted Roads and as such are public thoroughfares. This fact was confirmed to me by the solicitor who acted for me when I purchased Coniston. The 'Private Road' signs were erected by residents, without legal authority, merely in an attempt to stop people parking outside their properties</p>	<p>Both Westfield Road and Parkfield Place within The Shrubbery Conservation Area have the status as highways not maintainable at public expense. As such, Newport City Council as highway authority is under no legal obligation to maintain it or to provide facilities such as street lighting. Generally, responsibility for maintenance falls to those whose properties adjoin it (frontagers).</p>
	<p>Being unadopted roads, in my view does not absolve the Council from it's responsibilities, such as street lighting, maintenance of drains and clearance of litter. Since the signs were erected in 1992 the Council has completely lost all interest in this jewel in Newport's crown and consequently the sewers have become completely blocked with silt and gratings have disappeared from view and are never cleaned. Litter picking has also stopped. The long term effect of the blocked drains in Parkfield Place causes scouring of the road surface, and this will continue to cause blockages further down Oakfield Road, if no action is taken by the Council.</p> <p>The Council's own leaflet on Conservation Areas states that "The Local Authority is under a statutory obligation to preserve and enhance the character and appearance of the Conservation Area" To my knowledge the Council has done nothing in this regard. Indeed they have even permitted development totally inappropriate to the area, such as a). allowing demolition of a Victorian conservatory at No.3 Westfield</p>	<p>The key to positively managing new development within Conservation Areas is to understand its significance. This document will allow officers and developers and owners to gain an understanding of this significance and therefore reduce the potential for inappropriate development.</p>

	Road and b).approving the erection of inappropriate decking at No.5 Westfield Road (against the advice of their own Conservation Officer).	
	I believe that the Council has a responsibility to act with the house owners to take part actively in jointly protecting and enhancing this area. For example, they could replace the rather ugly sodium lighting with light fittings more appropriate to the Victorian surroundings.	The importance of public spaces and the public realm is recognised by the Council. Improvements and repairs to the streetscene must be taken in a manner which is positive and enhances and protects the character of the conservation area. Internal meetings will take place to ensure that future works and improvements are made where possible.
	I note from my files that I wrote to the Conservation Officer in September 2003, at the time of another Shrubbery Conservation Area Appraisal, making many of the points expressed here. There seems to me little point in having these appraisals from time to time, if nothing is ever done by the Council to contribute to the enhancement, and as such the Council is not carrying out it's statutory obligations. Actions speak louder than words.	Your continued input into the process is welcomed and the purpose of the document is to manage future development and where possible guide future improvement opportunities.

COMMENTS RECEIVED ON THE STOW PARK CIRCLE CONSERVATION AREA APPRAISAL AND THE COUNCIL'S PROPOSED RESPONSE

Representor	Comments	Council Response
Local Resident	Well done on your stow park conservation appraisal.	Your support is welcomed.
	I would like to make a number of points ,you have a registered park and Garden see p23 this is not a park or a garden and yet you have omitted the, Green space to the west of stow park drive [why] and why have you included	The Registered Park and Garden is the name of the statutory protection managed under Cadw.
	The top of Kingsdale court's garden but not the bottom end ,	The bottom of Kingsdale court will be included within the boundary.
	One last point you give 1a stow park crescent a positive contributor status, But this house was only recently built.	1a Stow Park Crescent has been identified as a positive contributor by mistake and this has been rectified.
GGAT	Thank you for consulting us on these Conservation Area Appraisals, and we welcome the revisiting and reconsideration of these areas.	The fact that GGAT's HER and Archwilio whilst being the Welsh Ministers' public interface for archaeology, is not the full record and

	<p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales. We note from the Appraisals (paragraph 3.2.2) that GGAT HER and Archwilio are mentioned; it should be noted that Archwilio, whilst being the Welsh Ministers' public interface for archaeology, is not the full record and must not be used for commercial and development purposes.</p>	<p>must not be used for commercial and development purposes will be clarified in the adopted CAA.</p>
	<p>The Appraisals acknowledge the value and highlight the likelihood of archaeological remains within the Conservation Areas, having a timeline noting the development of the city, although some areas in Stow Park are noted as having little archaeological interest. However, for Stow Hill, the eastern area, as noted falls within the western part of the City Centre Archaeologically Sensitive Area, and was the site of an early castle associated with the early Medieval settlement around what is now the Cathedral. The importance of the origins of Newport in maritime transport and trading, as well as early settlement of both religious and secular nature is recognised. These have contributed to the form and layout of the city and environs. As noted in the drafts, examination of historic mapping has shown that settlement and land use has changed over the centuries and recognition of the reasons for this allows better identification and interpretation of the historic assets, archaeological resource and built heritage. The development, restoration or change relating to areas or properties within these Conservation Areas may have archaeological issues that may require mitigation.</p>	<p>It is considered that the appraisal sets out the need of understanding the heritage asset and its significance when proposing a development, which includes archaeology.</p>
	<p>The drafts note process for identification of risk to the Conservations Areas and also identification of opportunities for their enhancement and protection. This will also, in parts of the areas, identify the same for the historic environment and buried archaeological resource, this also should be recognised as another allied benefit.</p> <p>The management of all these areas, and the impact of development, or changes to them, needs to be managed and mitigated in line with current Welsh Government Policy, Chapter 6 of Planning Policy Wales, Conserving the Historic Environment, TAN24: The Historic Environment; and supporting Best Practice Guidance.</p> <p>Proposed changes can affect standing structures, as well as buried archaeological remains, and these can be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p>	<p>The requirement to consider archaeological impacts are set out in the document, as well as relevant legislation and policy. It is not considered necessary to repeat national policy in this document.</p>

	<p>It is important to recognise that Planning Policy Wales refers to archaeological sites, including historic assets, being preserved in situ as a priority, and preserved by record if their preservation in situ cannot be achieved.</p>	
	<p>All archaeological work, including that undertaken to assess change in sensitive habitats which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the CfA or by a MCIfA level member. These professional organisations are experienced in working alongside other professions where archaeology is a consideration with other matters.</p>	<p>The specific requirements of undertaking archaeological assessment etc. should be defined at a case by case basis. The use of competent persons when undertaking archaeological works is supported.</p>
<p>Handpost Community Library Association (Cwtsh Community and Arts Centre)</p>	<p>Please be advised that, as the Chairman of the Handpost Community Library Association at 226, Stow Hill, Newport (more generally known as Cwtsh Community and Arts Centre) I, and my fellow committee members, wish to apply for the Cwtsh Community and Arts Centre to be included within the proposed Stow Hill/Handpost Conservation Area and would appreciate it, if you could forward an email reply confirming that we have, indeed, been included in the aforementioned Conservation Area.</p>	<p>Although this boundary change was part of a discussion at the public exhibition there are no plans to exclude the centre from the Conservation Area.</p>
<p>Local Resident</p>	<p>As I mentioned to you there was just one paragraph in the draft appraisal that I thought caused confusion. It was paragraph 5.2.2, under the Management Plan section. It states "The extent of permitted development (...) may also be restricted (...). Additional control may be sought through Article 4 Directions, which specifically revoke permitted development rights."</p> <p>When we discussed this, you confirmed that it wasn't within the scope of the appraisal to look at changes to Permitted Development Rights, but that it may be something that is looked at through another proposal at a later date. So, I think having this statement in this appraisal could potentially confuse the reader into thinking that the Management Plan proposed includes Permitted Development changes and so it would be better to either state that it would be a separate proposal or remove the paragraph altogether. I hope that all makes sense and is helpful?!</p>	<p>The need for article 4 directions has been re-evaluated and explained in the CAA. Further work on the progression of this recommendation will follow.</p>
<p>Local Resident</p>	<p>1 The plan showing the properties that make a positive contribution to the area (page 23) correctly shows No. 1 coloured blue and No. 3 (Evergreen) not coloured.</p> <p>2 When tabled on page 39 No. 1 is missing but No. 3 Evergreen is present.</p> <p>3 On page 31 there is a reference to trees but this seems refers to "The Shrubbery" so may have been carried over from another document</p>	<p>The table in Appendix A has been updated to reflect the correct address.</p> <p>The reference to trees has been updated to reflect the correct Conservation Area.</p>

	<p>4 I have cross hatched a small parcel of land at the foot of my garden on the Proposed Boundary Amendments plan on page 28. This area is now occupied by a partly constructed house (Planning decision 16/0299) and I suspect that the design would be unlikely to be regarded as a positive contributor!</p>	<p>The boundary has been reviewed and the boundary reflects the boundary of the retained wall before the forested slope.</p>
<p>Local Resident</p>	<p>The Shrubbery Conservation Area consultation response</p> <p>We hope our response is supportive.</p> <p>We have lived in the same home within the Conservation Area for over 32 years and have sought to follow the spirit of legislation/guidance, although this has not always been easy or financially advantageous, for example, in the addition of a ‘Victorian style’ mahogany and regularly managing large trees in our garden.</p> <p>Opportunities and Threats</p> <p>Opportunities</p> <p>“Statutory control measures are intended to prevent development that may have a negative or cumulative effect on this significance” (5.2.1.) but such interventions should avoid a ‘them’ and ‘us’ relationship.</p> <p>The SPG provides a vision. If it is to become a reality, quality technical guidance should be available from Council Officers experienced in dealing with these matters, similar to our recent positive experience in working with the City Council’s Building Control Officer. This should include how residents are enabled to share experiences to mutual advantage in finding practical solutions to often expensive requirements.</p> <p>Recognising the over arching importance of the Wellbeing of Future Generations (Wales) Act 2015, and the guidance requirements placed upon public bodies, does any aspect of the reports technical guidance require review in the context of climate change and the need to find practical solutions to reducing sources of home energy loss and cost?</p>	<p><i>It is noted that the comments are entitled The Shrubbery Conservation Area consultation response however the comments relate to the Stow Park Conservation Area and have been treated as such.</i></p> <p>This approach towards good conservation practice is welcomed.</p> <p>Guidance is available through Cadw and other heritage bodies such as SPAB. The conservation officer can also provide more detailed advice through pre-application.</p> <p>The purpose of this guidance is to set out proposals for the preservation and enhancement of the Conservation Area, through the recording and analyses of the character and areas of special interest. The need to manage climate change is a topic that affects our built environment and were adaptation or</p>

		<p>other methods of low carbon efficient are proposed within these areas would be encouraged as long as they meet the requirement to preserve or enhance the character of the Conservation Area. This is dealt with on a case by case basis, as is appropriate, and is supported under wider government actions such as permitted development rights in Conservation Areas for microgeneration.</p>
	<p>Threats</p> <p>Although, unmentioned in the legislation, if we are to maintain a good balance between residential and commercial use, it will be important to understand the varied socio-economic circumstances of residents. For example, in arguing that ‘interventions’ and ‘repairs’ be to ‘the highest quality’ is it fair to treat a large housing organisation in exactly the same way as a retired couple living on a fixed income without access to appropriate technical expertise, contacts and building services?</p> <p>Emmaus House, a former residential care home in Newport with a large garden is set to be converted into self-contained flats for older people. Although in the middle of the Conservation Area and unoccupied for two years it is not mentioned in the report but is another example of how austerity and the City Council’s inadequate payment arrangements has impacted upon the Conservation Area.</p>	<p>The requirements of owning a property within a conservation area are well known and publically available, it would not be considered appropriate to reduce the level of protection to the historic environment which is of course a finite resource. Provision of a financial incentive for individual owners is something that is not currently available. It is not something that can be covered in this document but will be raised as something for the Local Authority to consider to aid in the future positive management of its historic environment.</p>
	<p>We now turn to recommendations in the draft report:</p> <p>3. Any new design, intervention or repair should be of the highest quality, regardless of scale, as per the guidance set out in section 5.3 of this Management Plan.</p> <p><i>Reason: To protect the character of the Conservation Area.</i></p>	<p>The highest quality repair does not necessitate the most expensive solution. The aim here is for the use of traditional materials and methods that will provide a long term and effective solution. It is proposed to amend the wording to read ‘Any new design, intervention or repair should be of high quality, regardless of scale....’ The proposed improvements recorded are not matched with resource and</p>

	<p>Comment:</p> <p><i>When aiming for the highest quality repair, we should be very careful to avoid any action which could have unintended consequences. We need to be realistic, otherwise work will inevitably be delayed, or postponed. We all have to live within our means and we cannot always afford to attain the 'highest quality' desired. I would hope the City Council could deal with a nearby, large and long-standing pot hole, before acting on a recommendation to "extend the coverage of the traditional pennant flagstones on the pavements and also to replace modern streetlamps with traditional lanterns" (4.3.10).</i></p>	<p>have been identified in case such opportunities arise.</p>
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The report refers to a boundary wall at the corner of Caerau Crescent. Here we have seven large ties where the brickwork has cracked due to heavy traffic, Telephone Company digging and pounding near the wall and large tree roots. We lacked technical advice about realistic options from the Council's Conservation Officer. After much research, and with the aid of calculations provided by a Structural Engineer used by public bodies, an experienced creative (non-local) builder, supervised by a Building Regulations Officer, we implemented a traditional method of dealing with the problem involving galvanised steel using ties bolted into RSJ's secured with a deep concrete foundations. Properly stabilising and repairing a 20 plus metre wall takes time and care with associated work taking place at an appropriate pace. Any one who has seen the use of ties in old buildings will recognise they are fit for purpose and highly preferable to the way in which, for example, the Council agreed to an adjacent low level wall being constructed using material out of character with the area. **(Figure 1)** We do not accept the subjective description of the galvanised steel ties as described. **(Figure 2)**



The description of the ties has been amended to read significant rather than highly detracting.

2. Buildings, features and spaces identified as making a positive contribution to the Conservation Area will be afforded protection against harmful change.

Reason: To protect the character of the Conservation Area as a whole and the significance of its individual heritage assets, in line with Government policy.

Comments about existing harmful changes – some within the City Council's remit

The proposed improvements recorded are not matched with resource and have been identified in case such opportunities arise.

In recent years, the character of the area has been affected by the proliferation of fast food operations. On a windy day, especially at weekends, the corner of Stow Hill and Careau Crescent is often littered by all forms of waste paper, tin cans, plastic and other bottles. In addition, passers by sit on an adjacent, low-level brick wall (Figure 1 above) and throw rubbish into adjacent gardens. Previously, we had nearby a suitable sized public waste bin. These were removed by the City Council as an economy measure. Following complaints and through the effort of a local councillor, this has now been replaced with a small inadequate bin. Could several strategically placed iron bins do more for the character of the area than, say, traditional lanterns?

b. The low level red brick wall (Figure 2 above) is out of character with the area, yet had planning permission subsequent to the area's designation as a Conservation Area and sits oddly with the adjacent existing brick wall. (Figure 1 above)

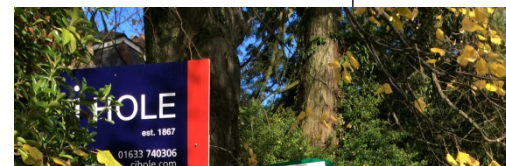
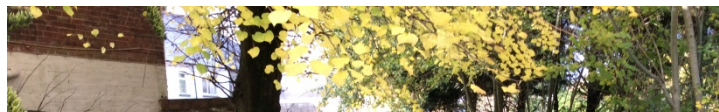


Figure 2

There is no record of planning permission for this wall, however the wall would not have required planning permission.

c. The report does not feature negative 'space'. For example, the large plot of land adjacent to 1 Careau Crescent. This has been an eyesore for many years, attracting beds, arm chairs, furniture and the like but this will have not been seen by a visual inspection from the road because of extensive vegetation. (Figure 3) This plot, at 1 Careau Crescent has a very low level wall. (Figure 4) This arose from it being allowed to fall into complete disrepair. Expensive bricks and top stones were taken down and neatly stacked several years. They were subsequently used as rubble to create a car park by tenants of the adjacent multi occupied house on land then owned by the Abbeyfields Society. (Figure 5) Why were cars allowed to park on the extensive rooting structure of trees with a preservation order without enforcement action taking place?

The site is known and the improvement of areas that cause detriment to the area will be encouraged. If a site becomes unsightly or a danger arises from unstable structures, then these are the responsibility of the site owners. The potential for the redevelopment of a site will be considered under its own merits through the planning system. This appraisal will be a consideration of the planning process.



d. The large entrance to 1 Careau Crescent originally had an interesting tall gate pier and brickwork supporting a shared boundary wall. This was destroyed with a vehicle entering the site twenty years ago. (Figure 6) The owner promised to make good the damage but failed to do so. With constant excuses over several years, we decided to remedy this damage ourselves.

Figure 5



Figure 6



The reinstatement of original features such as gate piers is welcomed.

3. Newport City Council will encourage proposals which seek to address the identified opportunities for enhancement, subject to their design.

Reason: To improve the character of the Conservation Area.

Comment:

Simple practical opportunities for enhancement have been indicated above.

Noted.

4. The removal and prevention of vegetation growth from boundary walls is encouraged.

Noted. The collaboration between landowners or those affected by such

Reason: To improve the aesthetic value of the streetscapes and improve the condition of the wall structures.

Comment:

There are sound economic reasons for the removal, prevention and management of vegetation. The wild state of vegetation on land at 1 Careau Crescent has impacted on a neighbours walls. Combined with the lack of maintenance and repair some wall piers had begun to collapse in 2017. (Part of the wall to the rear of 218 Stow Hill had already collapsed). To prevent a similar collapse to our boundary wall, we arranged for Abbeyfields to have access to our builder. This enabled our shared wall to be repaired (Figure 7). The point being that this required active collaboration between two responsible owners. This reinforces our earlier point that active co-operation between owners should be supported and encouraged. Could this be a priority action?



Figure 7

issues is supported. Such matters are beyond the scope of this appraisal and are in fact civil matters between the parties involved.

5. The rich green-ness of the Conservation Area should be protected through the considered management of existing trees and careful design of new planting.

Reason: To protect a defining characteristic of the Conservation Area and to manage trees in line with other local policy.

Noted. The collaboration between landowners or those affected by such issues is supported. The Council does have a Tree Officer who can be contacted to discuss such issues. The removal of a protected tree is subject to consultation and therefore the

My understanding is that **buildings** (and I would add, walls) should have priority consideration in the management of trees. Could this be confirmed?

Co-operation and communication between neighbours and the City Council is essential. For example, we have a nice Eucalyptus tree which creates an impressive archway across a driveway and is supported by 'fibre strap' attached to large Hawthorn tree in the adjacent open space at 1 Careau Crescent. Permission has been given for the removal of this Hawthorn tree, which means we will need to remove this archway feature. Such issues we think can best be managed in co-operation with the Tree Preservation Officer.

Next door has a large lime tree which has not been pollarded for many years. This has grown out of control and seriously affects the day and sunlight to our rear bedroom and our kitchen. **(Figure 8)** The sap from the tree has destroyed the cladding to our kitchen roof which we have recently renewed at considerable expense. We are now awaiting the new owner to address this issue.



Figure 8

involvement of interested parties is already part of the process. Such matters such as over grown trees are beyond the scope of this appraisal and are in fact civil matters between the parties involved.

6. Newport City Council will resist development where the high proportion of green space to building is affected.

Reason: To protect a defining characteristic of the Conservation Area.

Comment

We trust this does not impact on the urgent need to urgently progress plans for appropriate residential development on the vacant land adjacent to 1 Careau Crescent to deal with this long standing eyesore.

The potential for the redevelopment of a site will be considered under its own merits through the planning system. This appraisal will be a consideration of the planning process. The curtilage of a residential site is considered brownfield but the site would need to supply an adequate amount of green

		space to reflect the character of the area and provide amenity
	<p>7. Development with the setting of the Conservation Area which harms its character should be resisted. Development which positively contributes to the setting of the Conservation Area will be encouraged.</p> <p><i>Reason: To protect and enhance the Conservation Area in line with Government policy.</i></p> <p>Comment</p> <p><i>Please see above comments about land adjacent to 1 Careau Crescent.</i></p>	Noted
	<p>8. Newport City Council will support proposals to re-establish lost ironmongery features, subject to their design.</p> <p><i>Reason: To preserve a characteristic feature of the Conservation Area and improve the aesthetic value of the streetscapes.</i></p> <p>Comments</p> <p><i>What and whose proposals? Could City Council funds be used for a different purpose to improve the character of the area? For example, iron waste paper bins, or the repair of damaged public phone boxes?</i></p>	There are no specific proposals in terms of re-establishing lost ironmongery, but the council supports this work in principle where owners are able to reinstate lost ironmongery.
	<p>9. Newport City Council will resist proposals to cover external brickwork or masonry that was historically intended to be exposed.</p> <p><i>Reason: To protect the architectural quality of the buildings, including group value where relevant, and their condition.</i></p> <p>Comment</p> <p><i>The covering of external brickwork has been observed in Careau Crescent in recent years.</i></p>	Noted.
	<p>Other</p> <p>3.1.5 “John Logan, and included a section of railway tunnel to the south-east of the Conservation Area”. This is unclear.</p> <p>Local authorities have been impacted by austerity measures beyond their control and need to prioritise expenditure. It is assumed the Council are not able to support financially any report recommendations.</p> <p>December 2018</p>	<p>This error in text has been rectified.</p> <p>The appraisal sets out those management measure that would preserve and enhance the conservation area. This should be used to guide development appropriately and provide an understanding of where improvements could be made if funding or resources were made available.</p>

APPENDIX 2-

DRAFT ARTICLE 4(2) DIRECTION WORDING

**Town and Country Planning Act 1990
Newport City Council
XXXXXXXXX Conservation Area Article 4 (2) Direction 2019**

WHEREAS NEWPORT CITY COUNCIL of the Civic Centre, Newport, South Wales NP204UR (hereinafter called ‘The Council’) being the local planning authority for its area is satisfied that it is expedient that development of the descriptions set out in Schedule II hereto being development comprised within Classes A and C of Part 1 and Class C of Part 2 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 (hereinafter called “the 1995 Order”) should not be carried out within the dwelling houses and their curtilages specified in Schedule I hereto situated within the XXXXXX Conservation Area which for identification purposes is shown edged in red on the attached plan and it the extent set out in Schedule II hereto unless permission therefor is granted by the Council on an application made in that behalf.

NOW THEREFORE the Council in pursuance of the powers conferred on it by Article 4 (2) of the 1995 Order HEREBY DIRECTS that the permission granted for those forms of development set out in Schedule II hereto shall not apply to the properties in XXXXXX Conservation Area and specified in Schedule I to the extent permitted by Article 4 (2)-(5) of the 1995 Order and that this Direction may be cited as the ‘Newport City Council XXXXXX Conservation Area Article 4, Direction 2019’.

SCHEDULE I

Street	House Number

SCHEDULE II

- Removal, renewal or alteration of doors, door frames, windows and window frames, set within external walls of dwelling houses
- Alteration or addition of door and window opening , including heads, quoins and cills set in external walls of dwelling houses
- Removal, renewal or alteration to the external covering [including slates, tiles and ridge cappings] of the roof covering of a dwelling house
- Replacement, removal or renewal of rainwater goods, fascias and soffits
- Painting of external walls in a manner that materially affects the external appearance of a dwelling house
- Erection, renewal, alteration or demolition of the whole or any part of any gate, fence, wall or other means of enclosure
- The construction of a porch outside any external door which faces a highway
- The construction of a hard surface where it is nearer a highway than the dwelling
- The removal of render, spar, pebbledash or any similar surface finish to the walls of a dwelling house

Insofar as any such development referred to above would front onto a highway or open space.