

SIMEC USKMOUTH POWER STATION

Environmental Statement Volume 3

Appendix 9.1

Historic Environment Desk Based Assessment

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1 INTRODUCTION

- 1.1 This Historic Environment Desk-Based Assessment (DBA) has been prepared by RPS Planning and Development (part of RPS Group plc), on behalf of Simec Uskmouth Power Ltd (SUP or the applicant). It is intended that the assessment should be used as an Appendix to an Environmental Statement (ES) prepared in support of a planning application for development at Uskmouth, near to Newport in Gwent (National Grid Reference ST 3283 8384).
- 1.2 The DBA provides an account of the known archaeology and history of the proposal site and the surrounding area. Additionally, it identifies the relevant legislation, guidance and policy (national and local) regarding the historic environment.

The proposal site

- 1.3 The proposal site (hereafter the Site) comprises approximately 21.85 hectares of land within the environs of the existing coal-fired Simec Uskmouth Power Station (also known as Uskmouth B), on the eastern side of the River Usk close to its confluence with the Severn Estuary and around 4 km south of the centre of Newport (**Figure 1**).
- 1.4 The Site includes the existing coal-fired Simec Uskmouth Power Station along with land to the south and east.
- 1.5 The underlying basal geology within the whole of the Site is Triassic mudstone of the Mercia Mudstone Group, overlain by Tidal Flat Deposits laid down during the Quaternary Period (**Figure 2**).

2 LEGAL AND PLANNING FRAMEWORK

National Legislation and Policy

- 2.1 Legislative frameworks provide protection to the historic environment while planning policy guidance provides advice concerning how the historic environment should be addressed within the planning process.
- 2.2 Statutory protection for archaeology is principally enshrined in the *Ancient Monuments and Archaeological Areas Act* (1979) amended by the *National Heritage Acts* (1983 and 2002). Nationally important archaeological sites are listed in a Schedule of Monuments and are accorded statutory protection.
- 2.3 For other components of the historic environment, the *Planning (Listed Buildings and Conservation Areas) Act* (1990) and the *Town and County Planning Act* (1990) provide statutory protection to listed buildings and their settings and present measures to designate and preserve the character and appearance of Conservation Areas.
- 2.4 The *Historic Environment (Wales) Act* became law after receiving Royal Assent in March 2016. It gives more effective protection to listed buildings and scheduled monuments, improves the sustainable management of the historic environment, and introduces greater transparency and accountability regarding decisions affecting the historic environment.
- 2.5 Historic Parks, Gardens and Landscapes are described on a Register maintained by Cadw (and others) for Welsh Government. Such designation does not afford statutory protection, however the *Historic Environment (Wales) Act* 2016 includes a provision for historic parks and gardens to be placed on a statutory register and this is due to come into force in 2020. This register will not include historic landscapes.
- 2.6 The principal national planning policy is *Planning Policy Wales* (Edition 10, Welsh Government, December 2018, PPW10). Chapter 6 of PPW10 (Distinctive and Natural Places) includes a section (6.1) on The Historic Environment. This establishes Welsh Government objectives with regard to the protection of the historic environment and explains that responsibility for caring for the historic environment lies with all those that have an interest in the planning system.
- 2.7 Welsh Government objectives regarding the historic environment are defined in paragraph 6.1.6 of *PPW10* and seek to:
- *‘protect the Outstanding Universal Value of the World Heritage Sites;*
 - *conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy;*
 - *safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;*
 - *preserve or enhance the character or appearance of conservation areas, while at the same time helping them remain vibrant and prosperous;*
 - *preserve the special interest of sites on the register of historic parks and gardens; and*
 - *protect areas on the register of historic landscapes in Wales.’*
- 2.8 Regarding archaeological remains, Section 6.1 of PPW10 states: *‘The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not’* (Paragraph 6.1.23). *‘Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be*

of national importance)' (Paragraph 6.1.24). 'In cases involving less significant archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development' (Paragraph 6.1.25).

Section 6.1 goes on to say: 'Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to understand a full understanding of the impact of the proposal on the significance of the remains' (Paragraph 6.1.26). 'If the planning authority is minded to approve an application and where archaeological remains are affected by proposals that alter or destroy them, the planning authority must be satisfied that the developer has secured appropriate and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository' (Paragraph 6.1.27).

- 2.9 The policy regarding listed buildings is presented in Section 6.1 of PPW10: 'There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting, or any features of special architectural or historic interest which it possesses' (Paragraph 6.5.11).
- 2.10 The latter statement refers to the requirements under Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*.
- 2.11 Regarding conservation areas, PPW10 states: 'There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings. Positive management of conservation areas is necessary if their character or appearance is to be preserved or enhanced and their heritage value is to be fully realised' (Paragraph 6.1.14). 'There is a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character or appearance of a conservation area or its setting to an unacceptable level. In exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds' (Paragraph 6.1.15).
- 2.12 PPW10 also includes policies regarding historic landscapes: 'Planning authorities should protect those assets included on the register of historic landscapes in Wales.....The register should be taken into account in decision making when considering the implications of developments which meet the criteria for Environmental Impact Assessment, or, if on call in, in the opinion of Welsh Ministers, the development is of a sufficient scale to have more than a local impact on the historic landscape' (Paragraph 6.1.21).
- 2.13 The aspirations and vision of the Welsh Government regarding the historic environment are additionally expressed in the following documents.
- *People, Places, Future: The Wales Spatial Plan* (Welsh Assembly Government, 2008).
 - *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (Welsh Assembly Government, 2011).
 - *Historic Environment Strategy for Wales* (Welsh Government, 2013).

Local Policy

- 2.14 The *Newport Local Development Plan 2011 – 26* (the LDP) was adopted by Newport City Council in January 2015. A series of ten plan-specific objectives are set out in Section 1 of the LDP. Objective 5: Conservation of the Built Environment states: 'To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment'.

- 2.15 Section 2 of the LDP identifies the overall spatial strategy of the Plan, along with a number of Strategic Policies. Policy SP9: Conservation of the Natural, Historic and Built Environment states: *'The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals'*.
- 2.16 In Section 3 of the LDP, a series of General Policies are established that are applicable to any proposed development.
- 2.17 Section 4 of the LDP presents a number of topic-specific policies that address aspects of the environment. These include the following policies that may be relevant to this assessment:

Policy CE4: Historic Landscapes, Parks, Gardens and Battlefields

'Sites included in the Register of Landscapes, Parks and Gardens of Special Historic Interest and identified Historic Battlefields should be protected, conserved, enhanced and where appropriate, restored. Attention will also be given to their setting.'

Policy CE5: Locally Listed Buildings and Sites

'Buildings and sites of local significance for their architectural or historic interest will be included on a local list and should be protected from demolition or inappropriate development.'

Policy CE6: Archaeology

'Development proposals will normally be required to undertake an archaeological impact assessment before the proposal is determined:

- i) Where groundworks and/or the installation of services are proposed within the Archaeologically Sensitive Areas of Caerleon, the Levels, Lower Machen and the City Centre, or*
- ii) Within other areas of recognised archaeological interest.'*

Policy CE7: Conservation Areas

'Developments within or adjacent to Conservation Areas will be required to:

- i) Be designed to preserve or enhance the character or appearance of the Conservation Area, having regard to the Conservation Area Appraisal where appropriate.*
- ii) Avoid the removal of existing historic features, including traditional shopfronts and joinery.*
- iii) Use materials which are traditional, or appropriate to their context.*
- iv) Complement or reflect the architectural qualities of nearby buildings which make a positive contribution to the character of the area.*
- v) Pay special attention to the settings of buildings and avoid the loss of any domestic gardens and open spaces which contribute to the character of the area.*
- vi) Avoid any adverse impacts on significant views, within, towards and outwards from the Conservation Area.'*

- 2.18 With regard to LDP Policy CE5 cited above, Newport City Council produced a Local List Background Paper and Register (June 2013). This document provided a background to the proposed creation of a Local List and explained the policy context for such a list. The criteria for including buildings on the Local List were described and a proposed list was included as Appendix 2 of the Background Paper, based primarily on a Newport Borough Council document that had been produced in 1995. The buildings on the proposed list were identified by parish and then by name, with no further description. This proposed list has not been formally approved by the Council.

- 2.19 With regard to LDP Policy CE6 cited above, Newport City Council has prepared a Supplementary Planning Guidance document 'Archaeology and Archaeologically Sensitive Areas' which was adopted in August 2015. This document states that where development is proposed within areas identified within the LDP as Archaeologically Sensitive Areas, early consultation with the Glamorgan Gwent Archaeological Trust is encouraged. An initial desk based assessment should be made and a field evaluation may also be required. Any archaeological implications can then be identified, and the appropriate mitigation strategy considered, if necessary, early within the consideration of the planning application. Further, prior to implementing a planning permission the developer must prove that suitable provision has been made for the archaeological investigation of the site, its recording and publication of the findings as necessary.

Guidance

- 2.20 Detailed guidance on planning and the historic environment is provided in *Technical Advice Note 24: The Historic Environment* (TAN24: Welsh Government 2017).
- 2.21 Regarding archaeological remains, TAN24 provides the following guidance:

'Archaeological remains are a fragile and non-renewable resource. In many cases they are highly fragile and vulnerable to damage and destruction. Produced by human activity over thousands of years, they are the only evidence of our prehistoric past and complement historic records from the last 2,000 years. Archaeological remains include evidence buried below the ground and the surviving fabric of historic buildings and structures. Their significance, as evidence of the past development of our civilisation and as part of Wales' identity, is not necessarily related to their size, visibility or popularity.' (Paragraph 4.1)

'The conservation of archaeological remains is a material consideration in determining a planning application. When considering development proposals that affect scheduled monuments or other nationally significant important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant adverse impact causing harm within the setting of the remains (see Annex A). In cases involving less significant archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings, including the need for the proposed development.' (Paragraph 4.2)

Annex A of TAN24 as referenced above deals with the legal issues applied to scheduled monuments.

'Where development might reveal, disturb or destroy archaeological remains, including palaeoenvironmental evidence, it is important that opportunities to record archaeological evidence are taken and that archaeological remains are not needlessly destroyed. The ability to record such evidence should not be a factor in deciding whether controlled removal should be permitted.' (Paragraph 4.3)

'The needs of archaeology and development may be reconciled and potential conflicts between development proposals and the preservation of significant archaeological remains can often be avoided through pre-application discussion. This should be between the applicant, the local planning authority, their archaeological advisors and, in cases where scheduled monuments may be affected, Cadw. In the case of those local authorities that do not have in-house archaeological advisors, they could draw upon the expertise and advice of the curatorial sections of the Welsh Archaeological Trusts.' (Paragraph 4.4)

'Where there is a possibility that archaeological remains may be present, applicants are encouraged to make an enquiry with the body responsible for the relevant historic environment record and seek advice from the local planning authority's advisor at an early stage in considering their development proposal. This will help determine if the proposal might impact on known archaeological remains. Certain major developments require pre-application consultation with the local planning authority and, where specialist advice is required, the Welsh Ministers through Cadw.' (Paragraph 4.5)

'Where archaeological remains are known to exist, or considered likely to exist, and a study has not been undertaken by the applicant, the local planning authority should ask an applicant to undertake a desk-based archaeological assessment and, where appropriate, an archaeological evaluation. These should be done by a competent expert to the appropriate standard. The reports of these investigations will form part of the planning application. Applicants should show how they have modified their development proposals to minimise any negative impact on the identified archaeological remains, and how they intend to mitigate any remaining negative impacts.' (Paragraph 4.7)

'The need for a desk-based assessment, and field evaluation where appropriate, should be discussed with the local planning authority prior to submission of an application, and where required the results of these studies should be submitted as part of the planning application. Failure to provide sufficient archaeological information of the appropriate standard may be a valid reason for the local planning authority to refuse planning permission.' (Paragraph 4.8)

'When considering planning applications that affect known or potential archaeological remains, the local planning authority should consult with their archaeological advisor, about the impact, including the potential scale and harm, of the development on archaeological remains, and/or the adequacy of the mitigation of what has been proposed. Where a planning application directly affects a scheduled monument and its setting then the local planning authority is required to consult the Welsh Ministers through Cadw.' (Paragraph 4.9)

'The case for the preservation of archaeological remains that are not considered to meet the criteria for national importance (See Annex A2), must be assessed on the individual merits of each case. The local planning authority must take into account relevant policies and material considerations, and will need to weigh the significance of the remains against the benefits of, and need for the proposed development. In cases where there are issues of more than local importance, applications may be called in for determination by the Welsh Ministers.' (Paragraph 4.10)

Annex A2 of TAN24 as referenced above identifies the criteria used for assessing the national importance of an ancient monument, but these criteria are not regarded as definitive.

'Having considered all policies and other material considerations and the need for the proposed development, the local planning authority may decide that the significance of the archaeological remains is not sufficient to justify their physical preservation. In these cases, the local planning authority must satisfy itself that the necessary and proportionate arrangements for the excavation and recording of these archaeological remains are secured, and the results of this archaeological work are properly analysed and published, and that arrangements are made for the deposition of the resulting archive to the appropriate standards. This can be achieved by the local planning authority issuing a brief setting out the scope of the archaeological work that is required, which should be prepared in conjunction with their archaeological advisor.' (Paragraph 4.12)

- 2.22 The document *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* was published by Cadw in 2011. This provided guidance on understanding heritage values and includes a section advising on how to assess heritage significance.

- 2.23 According to the guidance, heritage values fall into four inter-related groups:
- Evidential value – the potential of a place to yield evidence about past human activity;
 - Historical value - this derives from the ways in which past people, events and aspects of life can be connected through a place to the present. This value tends to be illustrative (providing insights into past communities and their activities) or associative (association with a notable family, person, event or movement);
 - Aesthetic value – this derives from the ways in which people draw sensory and intellectual stimulation from a place; and
 - Communal value – this derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.
- 2.24 Guidance on Heritage Impact Assessment in Wales has been published by Cadw (2017a) on behalf of Welsh Government. This document advises that a heritage assessment should ‘*take into account sufficient information to enable both the significance of the asset and the impact of change to be understood. It should be proportionate both to the significance of the historic asset and to the degree of change proposed*’ (Page 5).
- 2.25 In the Conservation Principles document (Cadw, 2011), setting was defined as: ‘*The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape*’.
- 2.26 This definition has been updated thus in TAN24: ‘*The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Setting is not a historic asset, though land within a setting may contain other historic assets*’ (Welsh Government, 2017, Annex D).
- 2.27 The definition is repeated in recent guidance regarding the issue of the settings of historic assets in Wales (Cadw, 2017b), which makes the following points:
- Setting usually extends beyond the property boundary of an individual historic asset.
 - Intangible factors such as function, sensory perceptions or historical, artistic, literary and scenic associations can be important in understanding settings, as well as physical elements within the surroundings of the asset.
 - When development is proposed there is a need to assess the historic assets that may be affected and understand how their settings contribute to the significance of these assets.
- 2.28 The 2017 document goes on to outline a four-stage approach to decision-taking, as follows:
1. Identify which historic assets and their settings could be affected by a proposed development;
 2. Define and analyse the setting of each historic asset and assess whether, how and to what degree the setting contributes to the significance of the asset;
 3. Evaluate the effects of the proposed development, whether beneficial or harmful, on that significance; and
 4. Consider options to mitigate or improve potential impacts on that significance.
- 2.29 Although assessments of changes within the settings of historic assets can involve non-visual issues such as noise, it is more usually the visual aspects of a development that form the major part of the assessment.
- 2.30 The existence of direct lines of sight between the historic asset and the proposed development is an important factor in judging the visual impact of the development. However, it is possible for changes within the setting to occur even when such a relationship does not exist. For example, views towards a listed building from a frequently visited location, such as a park or a public

footpath, may be affected by the presence of a larger development, even if the development is not directly visible from the building itself.

- 2.31 An assessment of visual impacts on the historic assets and their settings needs to consider a wide variety of factors including the location of the asset within the physical landscape, its relationship with contemporary and non-contemporary features within that landscape and the location, size and character of the proposed development in relation to these factors.
- 2.32 The assessment then needs to balance the impact of these various considerations based on informed professional judgment. Assessment of visual impacts can be undertaken in accordance with the procedures expressed in the *Guidelines for Landscape and Visual Impact Assessment* (3rd Edition, Landscape Institute, 2013). If there is the potential for changes within the setting of historic assets due to noise or other impacts than these would be considered using appropriate procedures.
- 2.33 There should also be consideration of the sensitivity to change of the setting of a historic asset. This requires examination of the current setting with regard to identifying elements that contribute to the significance of the asset, elements that make a neutral contribution to the significance of the asset and elements that make a negative contribution to (i.e. detract from) the significance of the asset.

3 METHODOLOGY

- 3.1 Data regarding known historic assets (designated and undesignated) has been sought from several sources, including the Regional Historic Environment Record (HER) maintained by Glamorgan Gwent Archaeological Trust (GGAT), the National Monuments Record for Wales, the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) and the Gwent Archives (Ebbw Vale).
- 3.2 A site visit was undertaken in February 2020 in order to review the physical nature of the land within the Site and to assess the current settings of historic assets that could be affected by the project.
- 3.3 This desk-based assessment has been compiled in general accordance with the guidance provided by the Chartered Institute for Archaeologists (CIfA, 2017) and in the document *Notes for Archaeologists undertaking Desk-Based Studies in South-East Wales* (GGAT, 2007).

Study Areas

- 3.4 The study area for historic environment data collection has comprised an area extending approximately 1 km from the edge of the Site.
- 3.5 For designated historic assets that could be affected by a change within their settings, the study area comprised an area extending approximately 3 km from the edge of the Site.

4 BASELINE POSITION

Introduction

- 4.1 Identified historic assets within 3 km of the Site are shown on **Figures 3 and 4** as Sites **1-17**. Further information on these is provided in the gazetteer presented as Annex 1. These are not all of the historic assets identified on the Regional HER and other available sources, rather they are the ones considered to be relevant to this baseline report.
- 4.2 The Site is located within the Gwent Levels, much of which has been placed on the non-statutory Register of Landscapes of Outstanding Historic Interest in Wales, part of the wider-ranging Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. The Site is not within the registered historic landscape (**Figure 3**).
- 4.3 The summary description in the Register for the Gwent Levels Landscape of Outstanding Historic Interest (LOHI) states that:
- 4.4 *'Three discrete and extensive areas of alluvial wetlands and intertidal mudflats situated on the north side of the Severn estuary represent the largest and most significant example in Wales of a 'hand-crafted' landscape. They are entirely the work of man, having been recurrently inundated and reclaimed from the sea from the Roman period onwards. The areas have distinctive patterns of settlement, enclosure, and drainage systems belonging to successive periods of use, and a proven and possibly quite vast potential for extensive, well-preserved, buried, waterlogged, archaeological and palaeoenvironmental deposits surviving from earlier landscapes.'*
- 4.5 A total of 21 Historic Landscape Character Areas (HLCAs) have been identified and described with regard to the Gwent Levels LOHI. Some of these extend beyond the boundary of the designated historic landscape as the actual boundary is based on other considerations and not just on the character of a particular HLCA.
- 4.6 The Site is located immediately west of HLCA 01: Nash/Goldcliff coastal zone (**Figure 4**). The description of HCLA 01 is provided on the GGAT website and states that *'This was, and still is, a common type of complex and diverse landscape, typical of the higher coastal parts of the levels. It is characterised by small, irregularly shaped fields, sinuous lanes with roadside waste, dispersed settlement and large commons.....The northern and western areas are over-shadowed by Uskmonth, Newport and Llanwern, but towards the coast, the area is quiet and secluded.'* (http://www.ggat.org.uk/cadw/historic_landscapes/Gwent%20Levels/English/GL_01.htm)
- 4.7 As described in the above quotation from the Register (paragraph 4.4), the Gwent Levels landscape is one that demonstrates the successive reclamation of land from the former tidal mudflats and saltmarshes and the subsequent utilisation of that land. This process started in the Roman period and continued through to the 19th century, although there were periods when reclaimed land was lost to inundation and the process had to be restarted.
- 4.8 The reclaimed land is slightly higher in the coastal areas and along the major estuaries of the Rivers Usk and Ebbw and it is here that the Roman and medieval settlements are predominantly located. The lower-lying land further back from the coast is known as the back-fens and these areas were the last ones to be drained and utilised.
- 4.9 There has been considerable research into the history and archaeology of the Gwent Levels, much of which has been focused on the higher ground at the coastal edge. This is partly because most Roman and post-Roman settlement is located here and is more accessible here. It is also because this land has been where most development has taken place within the most recent years in which archaeological investigation has been an integral part of the planning process. There has also been a large amount of academic research within the present intertidal zone (i.e. seaward of the reclaimed land) - this is because the post-Roman alluvium that covers earlier deposits and

material within the Gwent Levels proper has been stripped away by the sea and these earlier deposits are therefore visible and more accessible.

- 4.10 The potential for the presence of archaeological remains within the Gwent Levels is recognised in the designation by Newport City Council of two Archaeologically Sensitive Areas (ASAs), one covering the Wentlooge Levels (west of the River Ebbw) and one covering the Caldicot Levels east of the River Usk. These ASAs are similar in coverage to the nationally designated Gwent Levels Landscape of Outstanding Historic Interest but in places extend beyond that designation and also beyond the identified Historic Landscape Character Areas. The Site lies wholly within the designated Archaeologically Sensitive Area of the Caldicot Levels (**Figure 3**).

Prehistoric

- 4.11 Gwent lies just beyond the southern extent of a number of ice-sheets that covered northern Britain during period of glacial maxima during the last 500,000 years. The valley of the River Severn was recut by glacial meltwater each time the ice-sheets retreated. Although there is some evidence for human settlement in Wales as early as 225,000 BP, this seems to have ceased by about 175,000 BP with no activity recorded until at least 60,000 BP.
- 4.12 There is a general paucity of evidence for Lower Palaeolithic activity in Wales, therefore the recovery of a small quantity of material of this date from the Gwent Levels should be regarded as potentially significant (Aldhouse-Green, 2004). Some Lower Palaeolithic material was also recovered during the archaeological investigations associated with the construction of the Second Severn Crossing (now known as the Prince of Wales Bridge).
- 4.13 The Mesolithic period is one generally seen as being characterised by the presence of hunter-gathers groups traversing the landscape with seasonal exploitation of resources, although some settlements may well have been more permanent. The rising sea-level following the last glacial maxima would have resulted in the Gwent Levels being established as an area of tidal mudflats and saltmarshes, with reed swamps along the fen-edge (Rippon, 1996). During this time a considerable amount of material was deposited across what is now the Gwent Levels through processes of alluviation and peat formation. The deposition rate was not constant and there would have been periods of erosion but the overall environment was a depositional one. The deposits of this period are collectively referred to as the Lower Wentlooge Formation. The wetlands would have provided opportunities for fishing, fowling and hunting as well as the collection of edible plants. These activities could have taken place from temporary encampments on drier land within the Levels but equally so from the higher land just to the north, which was also quite heavily wooded during the Mesolithic period.
- 4.14 There are few sites of Mesolithic date in Gwent that have been subject to detailed archaeological examination, but several that have been investigated are within the Levels or on the adjacent dry land. At Uskmouth (but outside the defined study area), three sets of human footprints were found in laminated silts that were overlain by peat deposits radiocarbon dated to 6250 +/- 80 BP, whilst similar examples found in the intertidal zone at Magor Pill are slightly later at 5720 +/- 80 BP (Aldhouse-Green *et al.*, 1992). Excavations at Goldcliff identified a Late Mesolithic site which seems to have occupied a small wooded island surrounded by saltmarsh (Bell 2007a, Bell *et al.*, 2000; 2001, 2002; 2003). Several hundred worked flints were recovered from stratified contexts along with a substantial assemblage of animal bone, some of which display evidence for processing.
- 4.15 At the end of the Mesolithic (c. 4,000 BC), the rise in sea level began to slow down although mean sea level was still approximately 8 m below the present level (Allen, 1990). A series of peat deposits formed at this time as land plants colonised the mudflats and tidal saltmarshes – these are collectively known as the Middle Wentlooge formation (Rippon, 1996). The initial vegetation would have been wet alder woodland with subsequent open reed swamps.

- 4.16 There is limited evidence for Neolithic activity on the Gwent Levels and the surrounding higher ground. This may indicate that activity here may have been very limited during that period. However, for the wetland areas it could also mean that the evidence of Neolithic events remains buried beneath later material.
- 4.17 A skull of possible Neolithic date was recovered from Alexandra Docks in Newport, whilst other human remains also of potential Neolithic date were found in the early 20th century at Ifton Quarry which is on the higher ground to the north of the eastern end of the levels (Schulting, 2009). A few pieces of worked flint have been recovered from alder carr peat dated to the Neolithic at Vurlong Reen (Parkhouse and Lawler, 1990) and further material of similar type was recovered from the fill of a palaeochannel at Caldicot (Nayling and Caseldine, 1997). The full corpus of Neolithic finds in the wetlands on either side of the Severn Estuary has been summarised by Bell (2007b).
- 4.18 Some of the recorded Bronze Age activity within the Gwent Levels continued on into the early part of the Iron Age (c. 700 BC - AD 43), including settlement in what is now the intertidal zone west of Goldcliff Point and also activity at Magor Pill (Allen and Rippon, 1997) and at Greenmoor Arch (Locock, 2000). However, this period is more generally characterised by a substantial marine transgression in which much of the Levels were reflooded and alluvial clays known as the Upper Wentlooge Formation were deposited. The landscape would have returned to one dominated by tidal mudflats and saltmarshes, although some areas of reed swamp were present and peats continued to form in some locations.
- 4.19 No sites or finds of prehistoric date have been identified within the defined study area. This may be largely due to the subsequent formation of the Upper Wentlooge deposits, meaning that the prehistoric landscape is sealed beneath these deposits and therefore is not visible.

Roman

- 4.20 The initial efforts to drain parts of the Levels were made during the Roman period (AD 43 - 410). The full extent of this drainage remains unknown and most of the reclaimed land was subsequently flooded. However, some of the major drainage elements and axial alignments within the present landscape could have been first established during this time (Allen and Fulford, 1987; Allen *et al.*, 1992; Fulford *et al.*, 1994; Rippon, 1996, but see also Parkhouse and Parry, 1990 and Marvell, 2004). Any sea wall constructed at this time is likely to have been seaward of the present one and no evidence has survived for a Roman sea wall.
- 4.21 However, there is extensive evidence for Roman activity (including settlement) across the Levels and extending within the intertidal zone beyond the present sea wall (*cf.* Allen, 1998; 2000; Neumann, 2000). The establishment of such settlements with associated land-use may have required the construction of banks as well as ditches in order to control water flow. Investigations undertaken ahead of the establishment of the Gwent Levels Wetland Reserve at Goldcliff identified several banks that displayed evidence for maintenance and alterations. The fills of the associated ditches suggested heavy episodic flooding rather than smaller silting events thus it appears that the banks were successful in providing some level of protection against regular inundation (Locock 1997).
- 4.22 Palaeoenvironmental evidence indicates that the landscape across the Levels was open and predominantly pastoral, although some agriculture may well have been possible (Meddens, 2001; Meddens and Beasley, 2001). Livestock would have included cattle and sheep, although horses were also presented in reasonably high numbers. Known Roman settlements are mainly located on the slightly higher ground at the coastal and estuary edges. However, this may be a distribution based on opportunity for observation rather than a genuine distribution. Evidence of Roman navigation along the network of channels within the Levels is provided by the discovery of a well-preserved boat of early 4th century date AD at Barland's Farm, during work ahead of the construction of the Gwent Europark (Nayling and McGrail, 2004).

- 4.23 It appears that most, if not all, of the land reclaimed and used during the Roman period was subsequently inundated, with the deposition of alluvium (up to 700 mm thick) across the former ground surface which in places is preserved as a buried soil. This is likely to have been an episodic process in which different parts of the landscape were subject to various stages of deposition and stabilisation.
- 4.24 Roman material has been recovered from a location just to the west of the Site, although the record of discovery does not provide any details other than that the finds span a period from the late 2nd century AD to the early 4th century OD (Site 1). Roman material has also been recovered from the site of the Nash Sewage Disposal Works, east of the Site. At the sewage works, quantities of Roman pottery were found on the spoil heaps at two separate locations during construction work, with at least 40 vessels represented (Site 2). An archaeological investigation carried out in connection with a planned extension of the sewage works found that features of Roman date were present at a depth of approximately 0.8 – 1.0 m below ground level (Site 3). Further features, all of Roman date, were observed during a watching brief on a sewage pipeline in this area (Site 4).
- 4.25 Overall these records indicate widespread activity within the vicinity of the Site during the Roman period, including settlement. The evidence suggests that Roman land surfaces are sealed beneath up to 1.0 m of later material.

Early Medieval and Medieval

- 4.26 The limited evidence for Gwent in the early medieval period (c. AD 410 - 1066) points to a certain amount of continuity in both land use and settlement. It is likely that the void left behind by the departing Roman authority was taken up initially at least by members of local elites, with activity continuing in key sites such as Caerleon and Caerwent. The latter site may have been the location of an early monastic community. Most of the evidence for activity within the Levels during this period comes from documentary sources, predominantly descriptions of estate boundaries but also references to possible landing places. It is likely that there was some limited recolonisation, with small embanked 'infield' enclosures and potentially canalisation of natural channels (Rippon, 2000).
- 4.27 Caerwent remained as the main ecclesiastical centre of Gwent in the 6th and 7th centuries. Early churches were established throughout the region including examples at Newport (the precursor to the cathedral) and also at Bassaleg, Coedkernew and Great Pencarn.
- 4.28 There are also accounts of Viking raids on south Wales during the late 9th and early 10th centuries AD. Part of a boat thought to be of Scandinavian type construction was found during the construction of the Alexandra Dock at Newport in 1878 and a timber from this vessel was subsequently dated to approximately AD 950 (Hutchinson, 1984), although this was from the inner rings and a slightly later (possibly 12th century) date may be more appropriate.
- 4.29 Another boat was found in the intertidal area close to Magor Pill. This was dated (through dendrochronology) to around AD 1240 and was of shallow draft, ideal for traveling along the small tidal creeks of the estuary and utilising small ports or landing places. It had been carrying iron ore from Glamorgan to an unknown location when it foundered in the creek (Nayling, 1998). In contrast to this is the Newport Ship – a much larger vessel of 15th century date which was found on the west bank of the River Usk within Newport, during construction of the Riverfront Arts Centre. This was a merchant ship trading along the Atlantic coast and was probably built in northern Spain around AD 1450 (Nayling and Jones, 2013).
- 4.30 The current landscape of the Gwent Levels is predominantly a result of the process of drainage and recolonisation which commenced during the medieval period (c. AD 1066 - 1500). This was linked to the post-Conquest settlement of south Wales and the influx of English settlers with associated socio-economic elements that affected land ownership and land use. Some of the drainage may be associated with monastic ownership and the establishment of grange farms both

on the Levels and on the dry land. Monks Ditch appears to represent a clear boundary within the Levels, with land to the east potentially being held by English lords whilst that to the west was held by Welsh landlords (Rippon, 1997; 2014).

- 4.31 Small settlements were established on the dry land at the fen edge (e.g. Llandevenny, Bishton, Llanwern, Coedkernew, Magor, Undy) and exploited areas of the back-fen. Other settlements were established on the Levels proper; these were mostly dispersed but with some distinct foci (e.g. Redwick, Goldcliff, St Brides, Peterstone) and these were able to utilise the remaining open saltmarshes as well as the back-fens. A settlement was clearly present at Newport itself at this time, probably centred on the early church at Stow Hill which subsequently developed into the cathedral church of St Woolos. The castle further to the north and on the west bank of the River Usk dates to around the 14th century.
- 4.32 Over the last few decades the field patterns on the Gwent Levels have been studied in order to understand the history and sequence of this reclamation and the establishment of the drainage network. This includes not only the numerous reens (major and minor) which drain the wetlands but also the embanked watercourses that channel the runoff from the uplands to the north across the Levels to the coast. The process of reclamation and settlement was not constant and certainly there was a time at the end of the 14th century when population decline and climate change led to the (temporary) abandonment of some areas of land (*cf.* Rippon, 1996; 1997). The dispersed settlements across the Levels include individual farmsteads and properties, often within a moated enclosure for drainage purposes.
- 4.33 There are no sites or findspots of Early Medieval date within the defined study areas. A church was recorded at Nash in 1113 AD, however the present Grade I listed Church of St Mary includes some medieval fabric but is noted more for its 18th century nave with original gallery, box pews and three-decker pulpit (Site 5). The churchyard is shown on early maps as curvilinear in plan and this is often seen as an indication of an early foundation (Site 6).
- 4.34 To the north-east of the Site, a stone coffin was unearthed during preparation works for the British Aluminium Company and was considered to be of 14th century date (Site 7).

Post-medieval and Modern

- 4.35 The process of reclamation and enclosure of common land continued on throughout the post-medieval period (c. AD 1500 - 1800) with the back-fens being the areas that were predominantly the last to be enclosed and drained - in some cases that did not happen until the 19th century. There appears to have been an increased emphasis on pastoralism and a decrease in arable farming and this has continued until the present day. Settlements expanded and there was an increase in the number of dispersed farmsteads and roadside cottages. There was also considerable development at Newport where a thriving port was established.
- 4.36 A relict water-channel containing a single sherd of post-medieval pottery was found during a watching brief at the Newport Wetlands Nature Reserve, just to the east of the Site. A cattle skeleton was also recorded at this location (Site 8).
- 4.37 Detailed examination of LiDAR data has resulted in the identification of a number of small moated enclosures within the Gwent Levels, which appear to predate the gridded drainage system and may therefore be of medieval or post-medieval date. To the east of the Site is a line of three adjacent moated platforms (Site 9).
- 4.38 The earliest detailed maps of the area show the settlement at Nash (based around the church) and dispersed farmsteads across the rest of the landscape. The Ordnance Survey Datum (OSD) map was prepared by Charles Budgen in around 1811. 'Julian's Pill' is marked on this map (Figure 5) and is still present on modern mapping as Julian's Gout; it is just to the north of the Site. To the south of the pill are several buildings which are collectively marked as 'West Nash', with 'Farmfield'

to the south of Nash and 'Burnthouse' to the north. Not all buildings are named on this map. The sea wall is clearly shown, with some tracks seaward of the wall in the area of Fifoots Point.

- 4.39 The Commissioner of Sewers map for Nash (1830) is considerably more detailed with regard to field boundaries, and this detail is also included on the Nash Tithe Map of 1840 (**Figure 6**). On this map, Julian's Pill is named as 'Saint Julian's Pill' whilst to the south-west is a smaller unnamed inlet with two buildings on its southern side. The field containing the westernmost building is named on the Tithe Apportionment as 'Salt Wharf,' whilst the eastern building here is described as a public house. At West Nash, a building named as 'West Nash House' is located just within the Site. To the north-east of West Nash and outside the Site is a single building marked as 'Red Barn', whilst to the east is a larger property named as 'Great House'.
- 4.40 The 1st edition Ordnance Survey (OS) 6" to the mile map of this area was published in 1887. This shows that the West Nash name has been transferred to a property further to the east, just south-west of 'Great House' (**Figure 7**). The building indicated as 'West Nash House' on the Tithe Apportionment of 1840 and just within the Site is still present but is not named on the 1887 map. To the west of the Site, the small inlet is named as 'Thieves' Pill', with the former public house now named as 'Windbound Cottage'. At the seaward end of 'Thieves' Pill' are two small buildings named as 'Magazines', each with their own landing stage. These are powder magazines, located away from the dockyard and from areas of settlement for safety reasons. Further to the north-east along the bank of the River Usk is a group of four more powder magazines and three landing stages. 'Mooring Posts' are also indicated to be present on this side of the river.
- 4.41 On the 2nd edition of this map, published in 1902, very little has changed since the 1st edition. The building shown on the Tithe Apportionment of 1840 as 'West Nash House' and just within the Site is now named on here as 'Little Farm'. Further to the north, however, industrial activity had started to extend southwards as Newport expanded. The Great Western Railway (GWR) South Wales Division had been constructed across the northern part of the Gwent Levels in the mid-19th century, enabling Isambard Kingdom Brunel to extend the link from London into south Wales. A connection to establish a branch line along the eastern side of the river (the East Usk Branch) was made in around 1898 and this extended south past Coldharbour to a point just to the north of Julian's Gout.
- 4.42 By the time of the 3rd edition of the OS 6" map (published in 1922), the embankment for the East Usk Branch of the railway had been extended to pass through the Site, although the map does not indicate that any track is in place and it is unclear why the railway embankment was constructed all the way through to the sea wall at Fifoots Point (**Figure 8**). 'Little Farm' and 'Red Barn' are still present, with a short embankment west of 'Red Barn' providing a bridge for a track over the railway embankment. The powder magazines at 'Thieves' Pill' and the ones further to the north-east have passed out of use.
- 4.43 During the Second World War a number of military positions were established around Newport in order to defend the docks, which were a strategic target for enemy airborne assault. A number of features associated with these wartime defences are still present in the area. An aerial photograph of 1950 shows a Heavy Anti-Aircraft (HAA) battery located partially within the southern edge of the Site, with associated buildings present along the southern edge of West Nash Road (**Figure 9**). A probable barrage balloon tether site is also indicated on the southern side of this road, east of the HAA battery. This image also shows the start of construction of the Uskmouth A power station which opened in the early 1950s and was later demolished and replaced by the current Severn Power Station. The railway embankment has been widened in order to provide extensive sidings for the construction and operation of the power station. On the foreshore it is still possible to see (on the 1950 image and indeed on present-day aerial images) the remains of the landing stages for the former powder magazines, whilst 'Little Farm' and 'Red Barn' both appear to still be present immediately south of the railway sidings on the 1950 image.

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- 4.44 Uskmouth B power station was constructed in around 1959, north-east of Uskmouth A, and is now the Simec Uskmouth Power Station. Land within the Site has been used for the construction and operation of the power station, including the establishment of an extensive coal storage area. The Newport Wetlands Reserve was established to the south of the Site in compensation for the loss of mudflats at the site of the Cardiff Bay barrage; it opened in 2000.
- 4.45 In addition to the Grade I listed Church of St Mary at Nash (Site 5) as described above, there are several other designated historic assets within the defined study area. To the north of Nash and south of Pye Corner, the early 19th century house known as 'Fair Orchard' is a Grade II listed building (Site 10), whilst the adjacent 18th century barn and later additions form a separate listing (also Grade II – Site 11). Pye Corner Farmhouse was probably built in the 17th century but rebuilt in the late 18th or early 19th century, it is also listed at Grade II (Site 12). Another former farmhouse of early 19th century date, Tatton Farmhouse, is located approximately 3.0 km north-east of the Site and is currently semi-derelict (Site 13).
- 4.46 On the west bank of the River Usk and approximately 1.85 km south-west of the Site is the Grade II listed former West Usk Lighthouse which was built in the later part of the 19th century (Site 14).
- 4.47 Approximately 2.5 km north-west of the Site is the Grade I listed Newport Transporter Bridge (Site 15), which opened in 1906 to facilitate movement of workers between the factories on the east side of the River Usk and the areas of settlement on the west side. Just beyond the western tower of the bridge is the Grade II listed Waterloo Hotel (Site 16) which is also of early 20th century date, and which forms part of the small Waterloo Conservation Area (Site 17). There are several additional Grade II listed structures to the north-east of the Conservation Area and (just) within the defined study area but these would not be affected by the proposed development at the Site and are not considered further within this baseline document.

5 ARCHAEOLOGICAL POTENTIAL

- 5.1 Despite the 20th and 21st century industrial activity within the Site, there is still some potential for archaeological remains to be present. The land surface here during the Roman period may be 700 – 1000 mm below the pre-industrial level, and thus it is possible that evidence for Roman and prehistoric activity has survived at this depth. The available data resulting from site investigations (boreholes etc) are not sufficiently detailed for any conclusions to be drawn on this issue.
- 5.2 There is also some (limited) potential for remains associated with the Second World War HAA Battery to be present within the southern edge of the Site, as the scale of the subsequent work here to establish the coal storage area is not clear.

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Site Gazetteer

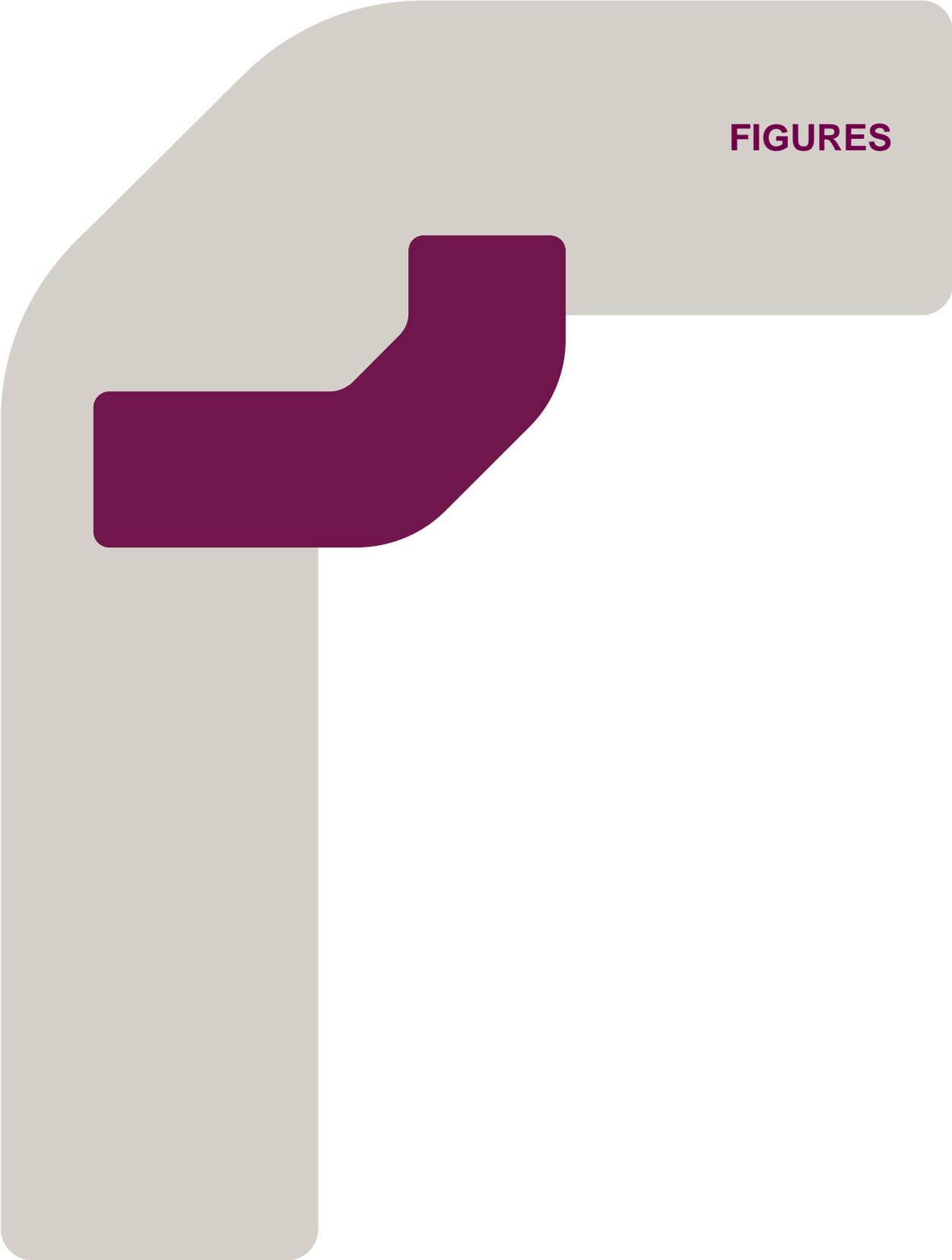
HER = Regional Historic Environment Record

NPRN = National Public Record Number

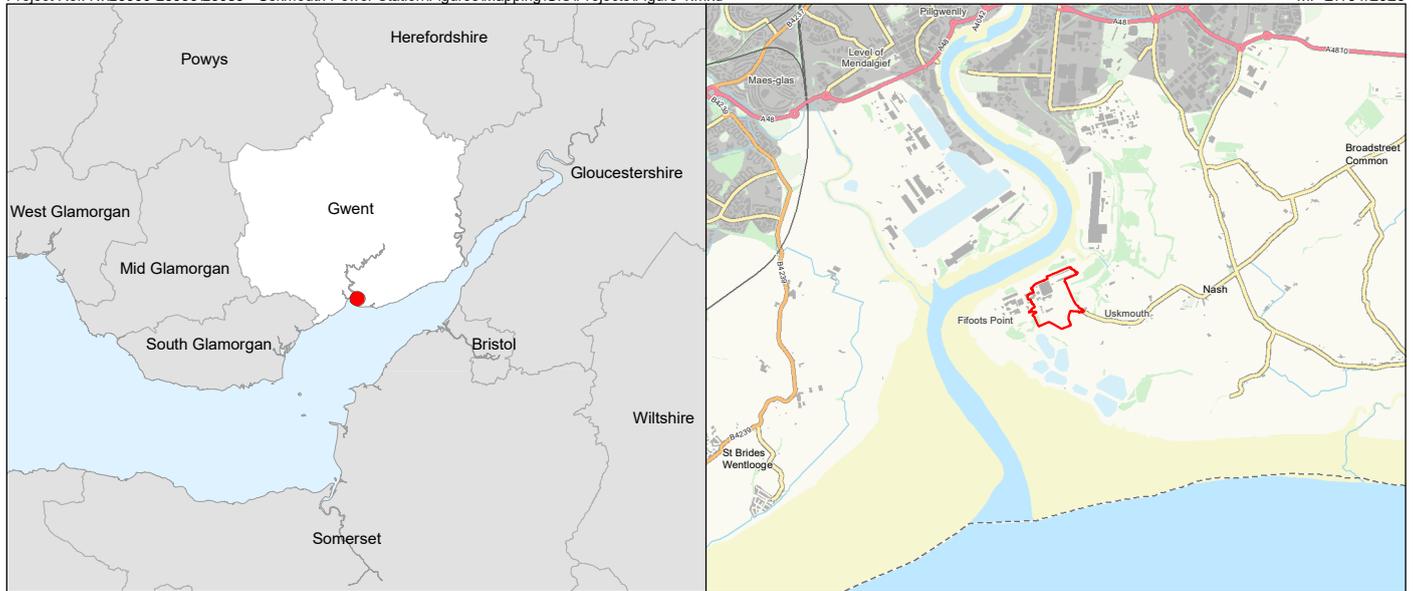
Site No	Source	Name	NGR	Period
1.	HER PRN03642g	Uskmouth Power Station – material of Roman date spanning the period late 2 nd century AD to early 4 th century AD, but may be wholly 3 rd century AD.	ST 325- 836-	Roman
2.	HER PRN03718g HER PRN03936g	Newport Sewage Disposal Works, Nash – Roman pottery found on spoilheaps at two separate locations during construction – at least 40 vessels represented – late 1 st century AD to late 3 rd or early 4 th century AD.	ST 336- 838-	Roman
3.	HER PRN05912	Newport Sewage Disposal Works, Nash – evaluation found Roman features at approximately 0.8 m to 1.0 m below the ground surface. Finds suggested occupation in the 2 nd and 3 rd centuries AD.	ST 337- 840-	Roman
4.	HER E004929	Watching brief during construction of South Eastern Coastal Strategy (SECS) sewage pipeline – section near Nash – features were all of Roman date and included ditches, pits, postholes and relic land surfaces.	ST 4130 8420	Roman
5.	NPRN 220567	Church of St Mary, Nash – Grade I listed church within large churchyard, medieval tower and spire, late 18 th century box pews and decked pulpit .	ST 3431 8366	Medieval
6.	HER PRN08232g	As seen on a map of 1846, the churchyard of the Church of St Mary at Nash was partly curvilinear, suggesting that it may have originated as an early foundation.	ST 3431 8367	?Medieval
7.	HER PRN00265g	Stone coffin containing human skeletal material unearthed by bulldozer during preparation works for the British Aluminium company. Considered to be of 14 th century date.	ST 3399 8412	Medieval

APPENDIX 9.1: DESK BASED ASSESSMENT

8.	HER E005671	Archaeological watching brief at the Newport Wetlands Nature Reserve – found two relic water channels and a cattle skeleton. One of the channels contained a sherd of post-medieval pottery.	ST 3343 8346	Post-medieval
9.	HER PRN10913g	Group of three adjacent moated platforms recorded through analysis of LiDAR data.	ST 3357 8346	Medieval or Post-medieval
10.	NPRN 17544	Fair Orchard – Grade II listed house of early 19 th century date.	ST 3456 8485	19 th century
11.	NPRN 17545	Fair Orchard barn and attached agricultural buildings – Grade II listed barn of 18 th century date (with 19 th century additions to rear)	ST 3455 8483	18 th century
12.	NPRN 17542	Pye Corner Farm – Grade II listed former farmhouse - probable 17 th century origins, rebuilt late 18 th / early 19 th century and modernised in the later 19 th century and again in the early 21 st century.	ST 3453 8516	17 th century
13.	NPRN 17543	Tatton Farm – Grade II listed former farmhouse of early 19 th century date, now semi-derelict.	ST 3521 8580	19 th century
14.	NPRN 3081	West Usk lighthouse – Grade II listed former lighthouse of later 19 th century date, now converted to residential use.	ST 3112 8288	19 th century
15.	NPRN 3076	Newport Transporter Bridge - Grade I listed transporter bridge opened 1906 and still in use as part of current road network.	ST 3179 8621	20 th century
16.	NPRN 18182	Waterloo Hotel, Pillgwenlly – Grade II listed public house opened in 1904.	ST 3156 8624	20 th century
17.		Waterloo Conservation Area – small area of Edwardian development at the gateway to the Alexandra Docks.	ST 3155 8629	



FIGURES



 Site Boundary

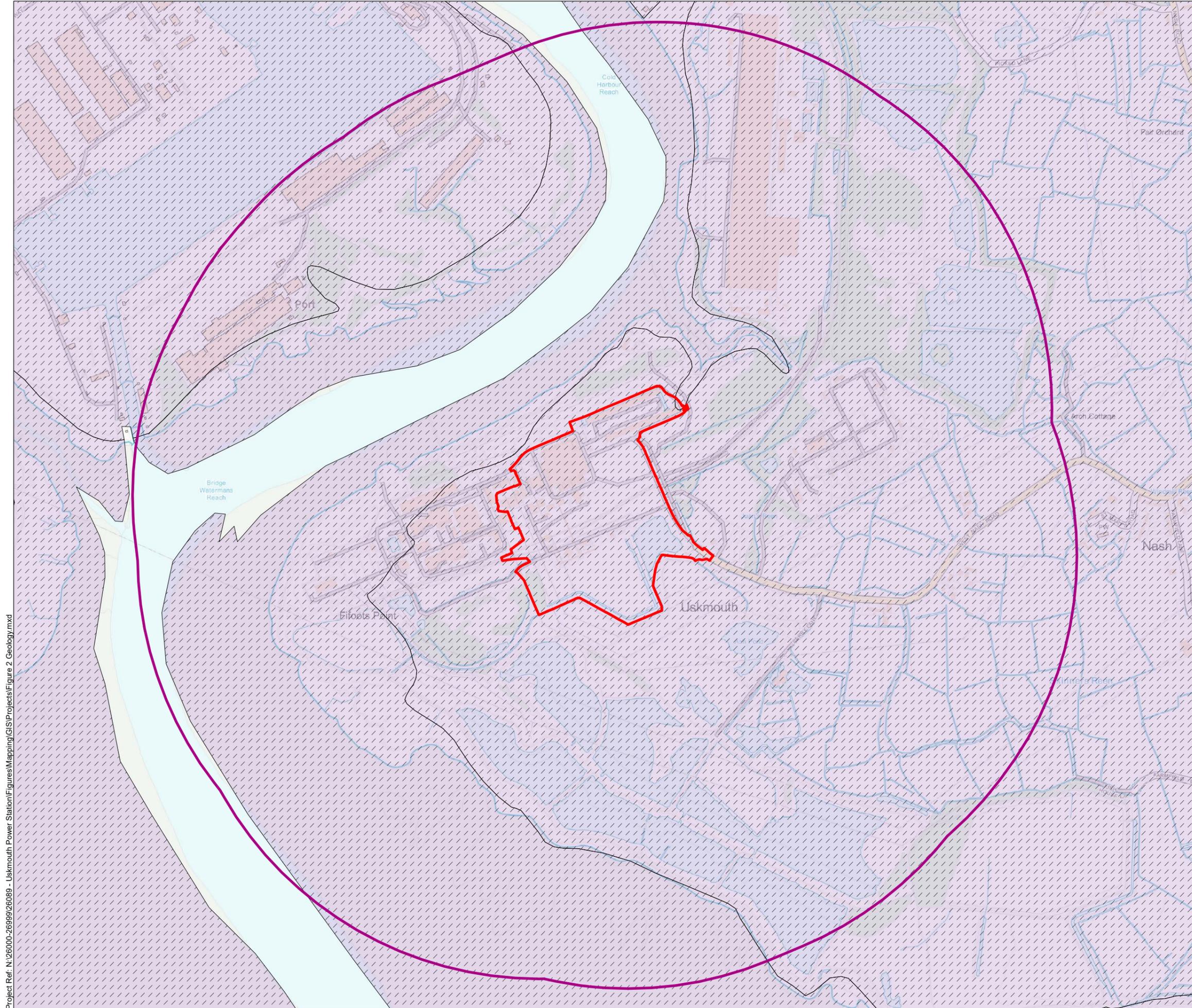


0 100 200 300m
Scale at A4: 1:10,000



Figure 1

Site Location



Legend

-  Site Boundary
-  1km Buffer

Superficial

-  TIDAL FLAT DEPOSITS - CLAY AND SILT

Bedrock

-  MERCIA MUDSTONE GROUP - MUDSTONE

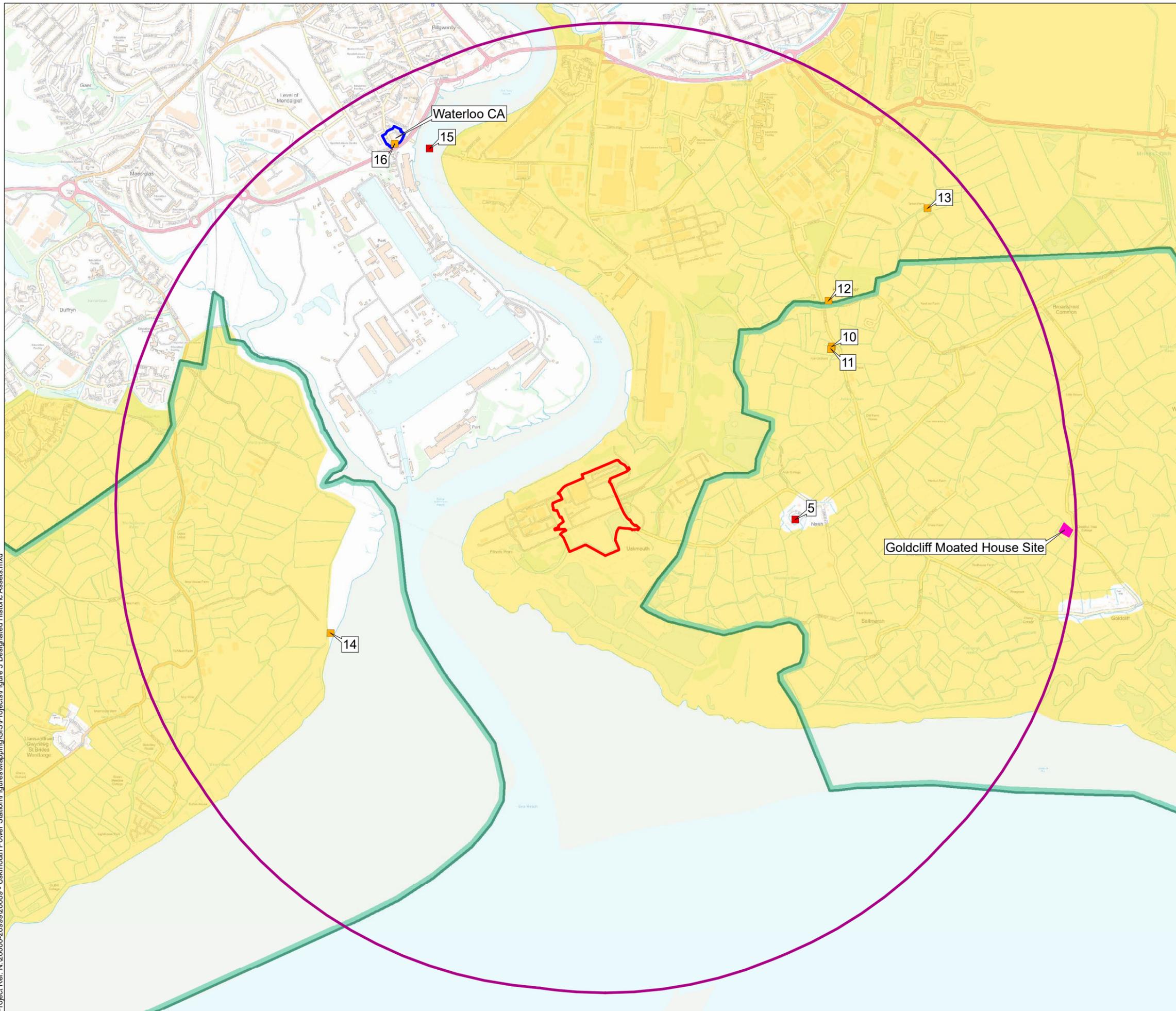
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 0 100 200m
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Figure 2

Geology

Project Ref: N:\26000-26999\26089 - Uskmouth Power Station\Figures\GIS\Projects\Figure 3 Designated Historic Assets.mxd



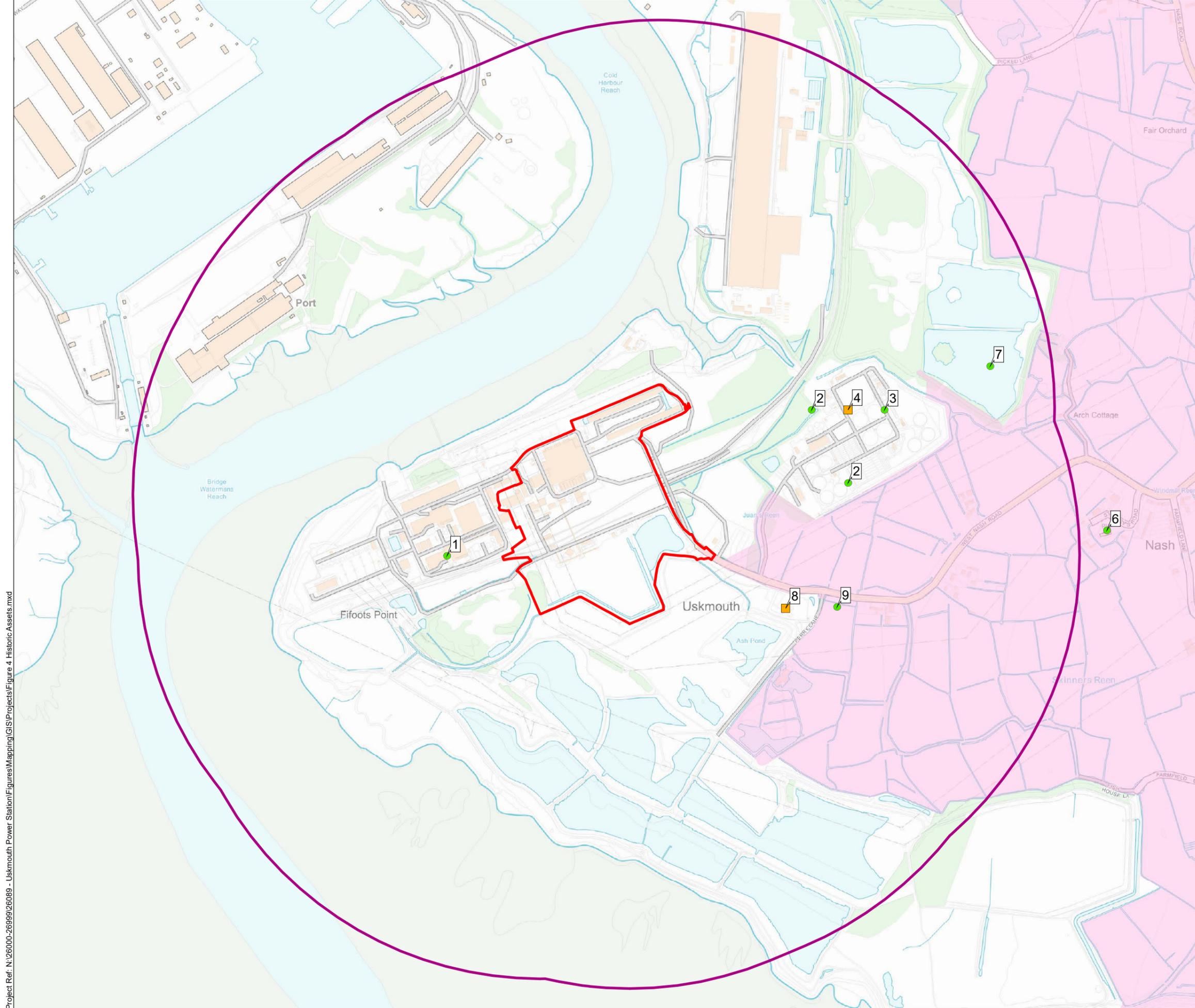
Legend

- Site Boundary
- 3km Buffer
- Scheduled Monument
- Grade I Listed Building
- Grade II Listed Building
- Conservation Area
- Gwent Levels - Registered Historic Landscape of Outstanding Interest
- Archaeologically Sensitive Area (Newport CC)

N
 0 250 500m
 Scale at A3: 1:25,000



Figure 3
 Designated historic assets within 3 km of the project site boundary



- Legend**
- Site Boundary
 - 1km Buffer
 - HLCA001: Nash/Goldcliff coastal zone
 - HER Feature
 - HER Event

N
 0 100 200m
 Scale at A3: 1:10,000



Figure 4
 Historic assets within 1km of the project site boundary

Project Ref: N:\26000-26999\26089 - Uskmouth Power Station\Figures\Mapping\GIS\Projects\Figure 4 Historic Assets.mxd



Legend

 Approximate Site Location

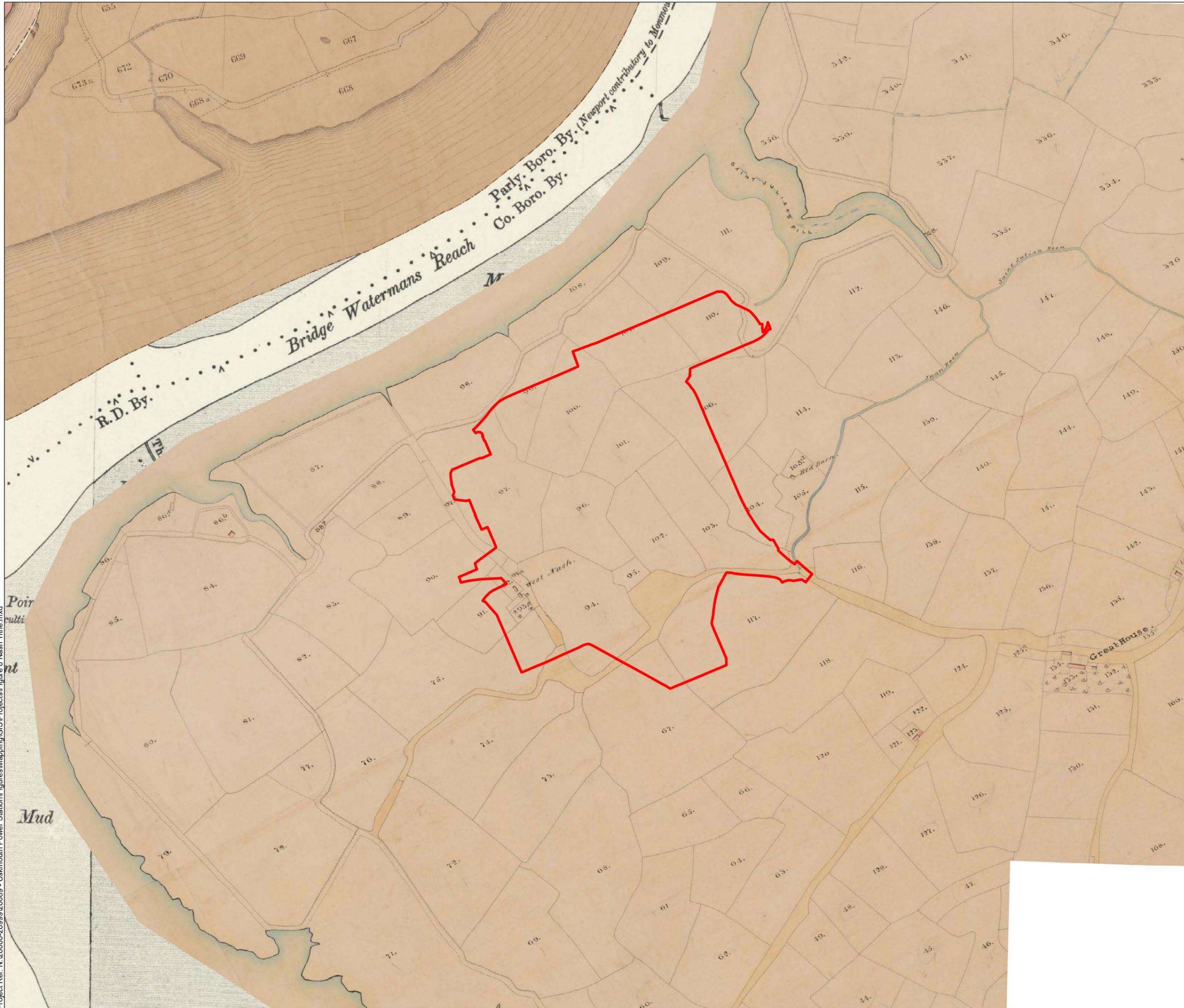



 Scale at A3: 1:15,000 approx.



Figure 5

OSD - 1811



Legend

 Site Boundary

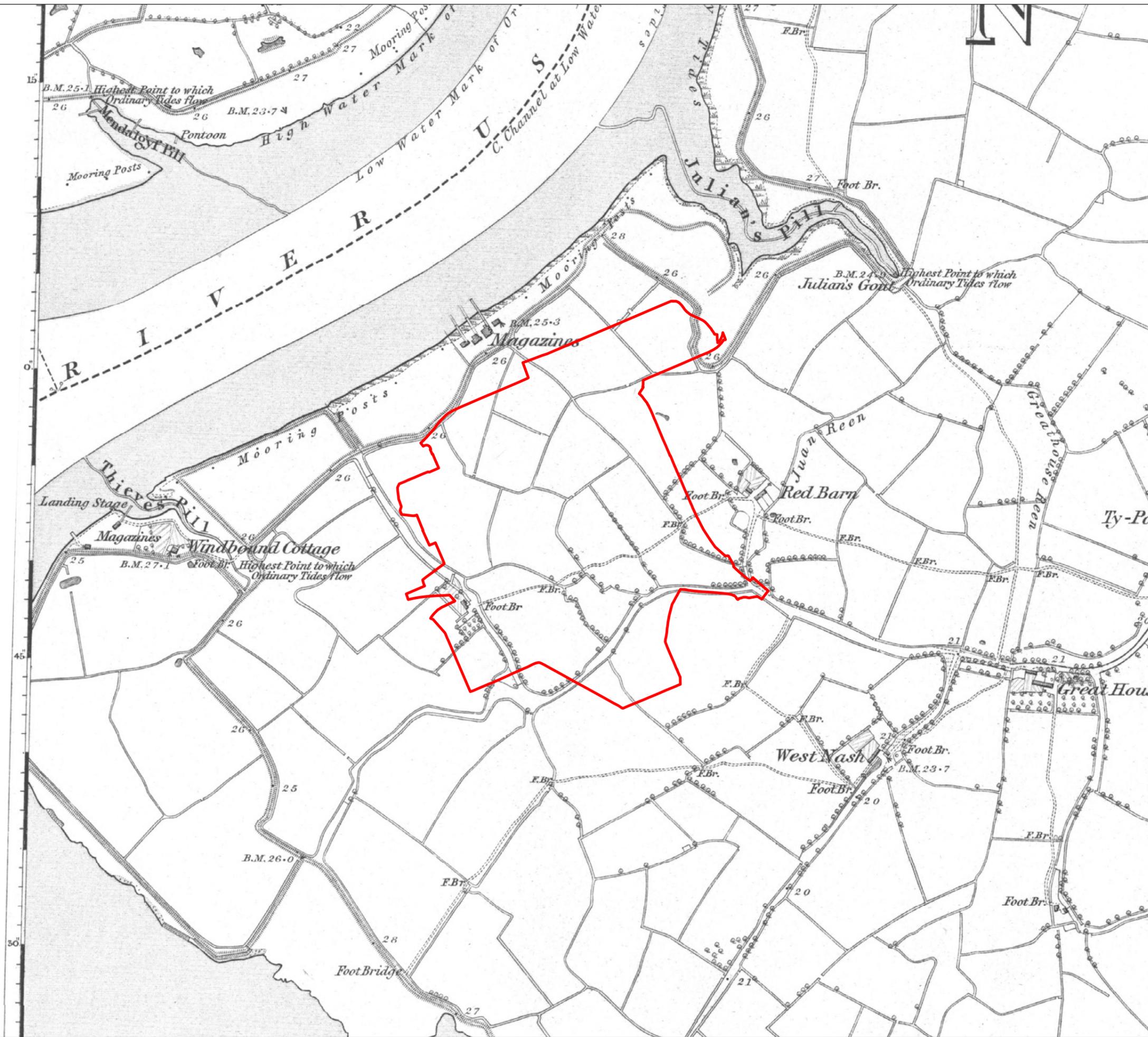


0 100 200m
Scale at A3: 1:6,000



Figure 6
Nash Tithe Map - 1840

Project Ref: N:\26000-26999\26089 - Uskmouth Power Station\Figures\GIS\Projects\Figure 6 Nash Tithe.mxd



Legend

Site Boundary

Scale at A3: 1:6,000



Figure 7
1st edition OS 6" map - 1887

Legend

Site Boundary

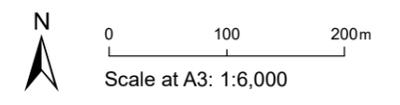
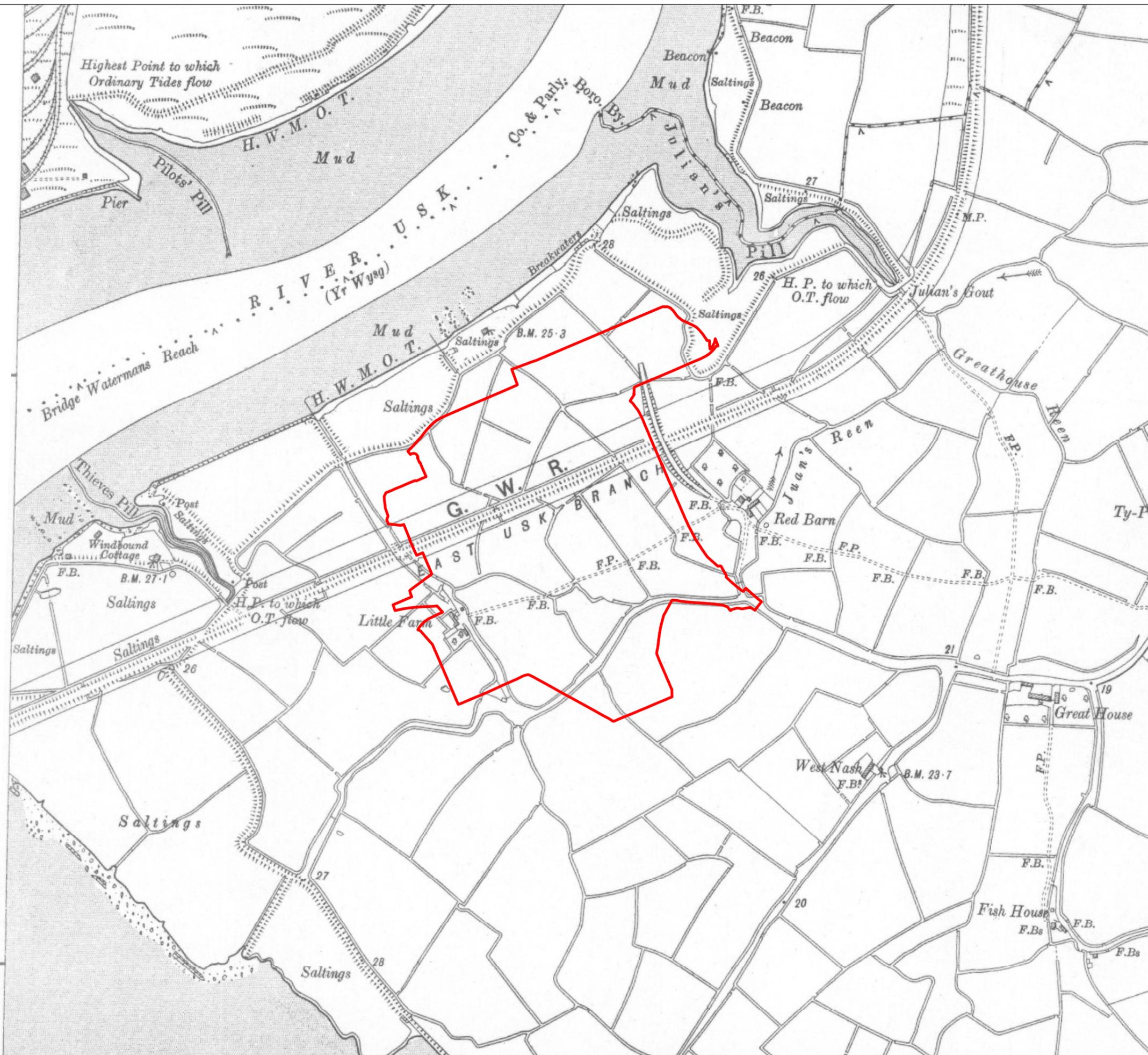


Figure 8
3rd edition OS 6" map - 1922

Project Ref: N:\26000-26999\26089 - Uskmouth Power Station\Figures\GIS\Projects\Figure 8 1922.mxd



Legend

 Site Boundary

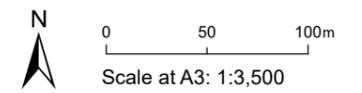


Figure 9

Aerial photograph - 1950