

Newport City Council

By email

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Your reference

CONNEX/26/0367

Ein cyfeirnod
Our referenceDyddiad
Date

11 June 2026

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Dear Sir/Madam

Planning Application – S73 application to vary conditions 1 (approved plans), 8 (sprinkler tank details), 9 (landscaping), 15 (lighting) and 16 (boundary details) of 25/1030 - Construction of a new sports and teaching facility including altered parking arrangements and associated landscaping and infrastructure. (Amendments include relocation of sprinkler and hydrant tanks) Caerleon Comprehensive School Caerleon Comprehensive School, Cold Bath Road, Caerleon, Newport

Thank you for your letter of 1 June inviting our comments on the information submitted for the above planning application.

Advice

This response is based on the advice provided by Cadw's Senior Historic Environment Planning Officer.

We consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment.

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

Assessment

This application is for the variation of conditions 1 (Approved Plans), 8 (Sprinkler Tank Details), 9 (Landscaping), 15 (Lighting) and 16 (Boundary Details) of 25/1030 - Construction of a New Sports and Teaching Facility including altered parking arrangements and associated landscaping and infrastructure. amendments include relocation of sprinkler and hydrant tanks at Caerleon Comprehensive School, Cold Bath Road, Caerleon.



Scheduled Monuments

MM230 Caerleon Legionary Fortress

MM231 Caerleon Civil Settlement

MM254 Caerleon Civil Settlement: Area under Broadway Playing Fields

In general, the variations applied for will not have any additional impact on the settings of the above scheduled monuments that are located inside 100m of the proposed development area: However, we have concerns about the proposed location of the Hydrant Tank which will be inside 20m of the boundary of scheduled monument MM230 Caerleon Legionary Fortress.

Planning application 25/1030 was accompanied by a Heritage Impact Assessment which considered the effect of the proposed development on the settings of the scheduled monuments, including MM230 and noted the possibility of there being an adverse impact. Consequently section 8.16 of that document states that: -

To mitigate this impact the proposal has been stepped back from the North-Eastern boundary of the site to reduce the perceived visual presence of a building of greater mass upon Caerleon Legionary Fortress.

We would therefore suggest that the applicant considers relocating the position of the Hydrant Tank. If this is not possible, then the applicant should submit an assessment of the impact of the proposed development on the setting of the scheduled monuments prepared by a competent and qualified historic environment expert in accordance with the methodology outlined in the Welsh Government's best-practice guidance Setting of Historic Assets in Wales (2017). Once this information has been submitted, Cadw should be reconsulted on this application.

Yours sincerely,

Laura Cooper

Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol

Annex A

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW [Planning Policy Wales - Edition 12](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. 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)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally 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 would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.