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Caerleon Comprehensive School

Planning Statement

November 2025

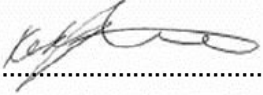
Document Control Sheet

Project Name: Caerleon Comprehensive School

Report title: Planning Statement

Date: November 2025

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Appendix 1 - Pre-application advice received



1. Introduction

- 1.1 This Planning Statement (PS) has been prepared by KEW Planning, on behalf of Newport Norse, to support the proposal for the creation of the new sports and teaching block at Caerleon Comprehensive School.
- 1.2 This PS provides an assessment of the proposed development against the provisions of the statutory Local Development Plan, Planning Policy Wales and other material planning considerations.
- 1.3 The site address is Caerleon Comprehensive School, Cold Bath Road, Caerleon, Newport NP18 1NF which falls within the administrative boundary of Newport City Council (NCC).

Figure 1: Site location Plan



Background

1.4 Caerleon Comprehensive school's built form and learning spaces are dated. As a result, there is an urgent need to deliver a modern, fit for purpose, replacement learning block and sports facilities, including upgrades to existing spaces, in order to provide a modern learning environment for pupils to thrive and enjoy their learning experience whilst also offering a facility that the local community can use and benefit from.

1.5 This proposal forms part of a wider initiative that seeks to improve the existing facilities at the school. The below lists some of the aspirations tabled by school representatives at the initial project meeting:

- Improve Sports facilities (sports hall, changing facilities, Astro turf & floodlights)
- Fit for purpose 6th Form Study area
- Improve toilet facilities
- Relocate reception to front of school for better legibility
- Improve and increase canteen facilities
- Repair/replace external walkways
- Remodel current accommodation
- Suite departments into more fitting areas
- Refurbish roofs
- Increase car parking spaces

1.6 Due to the complex nature of the requirement to demolish and construct a teaching block within an operational school site and obtain relevant bat licenses, the project has been split into a demolition and construction phase. This realigns the project programme and ensures minimal operational impact for the school.

1.7 Project phasing:

1. Full application for temporary sports hall (**Granted - Ref 25/0748**).
2. Prior approval for the demolition of blocks D1, D2, L G, H, A (Partial), K and D3 (**Prior approval required – Ref 25/0812**).
3. Full application for the erection of new teaching block and sports hall (**This application**).
4. Full application for temporary car park and site compound (**Under preparation – to be submitted**).

The Proposal

1.8 The description of the proposed development is as follows:

“Construction of a new sports and teaching facility including altered parking arrangements and associated landscaping”

Purpose of the Statement

- 1.9 This PS gives an overview of the proposal, the technical aspects and assesses these against the statutory adopted Development Plan; Future Wales; Planning Policy Wales, and other material planning considerations (such as Supplementary Planning Guidance).

Application Documents

- 1.10 This application is accompanied by the following documents:

- CCS-HLM-00-00-DR-A-00000-P03-Red Line Boundary
- CCS-HLM-00-00-DR-A-00001-P05-Site Block Plan – Existing
- CCS-HLM-00-00-DR-A-00002-P04-Site Block Plan - Proposed
- CCS-HLM-00-00-DR-L-00008-Existing Site Plan-P08
- CCS-HLM-00-00-DR-L-00007-Landscape Plan GA-P14
- CCS-HLM-AA-00-DR-A-00101-Block A - Ground Floor Plan - Existing-P09
- CCS-HLM-AA-XX-DR-A-00301-Block A - Main Building - Elevations - Existing-P01
- CCS-HLM-NN-00-DR-A-00111-New Block - Ground Floor Plan-P03
- CCS-HLM-NN-01-DR-A-00121-New Block - First Floor Plan-P03
- CCS-HLM-NN-R1-DR-A-00131-New Block - Roof Plan-P03
- CCS-HLM-NN-XX-DR-A-00300-New Block - Elevations-P03
- CCS-HLM-NN-ZZ-DR-A-00201-New Block - Sections - Sheet 1-P03
- CCS-HLM-NN-ZZ-DR-A-00202-New Block - Sections - Sheet 2-P03
- Viewpoint - Summer Existing
- Viewpoint - Summer Proposed
- View from Barracks copy
- View from Barracks Existing
- View from Rugby Existing
- View from Rugby Proposed
- 24-043 Caerleon Comprehensive TCP-Layout1
- 24-043 Caerleon Comprehensive TPP
- 24-043_Arboreal Implications Assessment and Method Statement
COMBINED_Caerleon_Comprehensive_Oct_2025.v1
- 24-043_Caerleon Comprehensive School_BS5837
Tree Survey & TCP. June 2024
- Archaeological Field Evaluation

- Caerleon Comprehensive GI Assessment November 2025
- Caerleon Comprehensive School PAC Report FINAL 27.11.2025
- Caerleon Comprehensive School, Bat Emergence Survey Report ISSUED
- Caerleon Comprehensive School, PEA Report ISSUED
- T01672 Caerleon School CEMP Rev 1 Main Works

- **Section 8** – provides a summary and conclusion.

Planning Statement Structure

1.11 This PS is set out as follows:

- **Section 2** – provides a description of the site and surrounding area.
- **Section 3** – sets out the sites planning history.
- **Section 4** – provides a summary of pre-application feedback.
- **Section 5** - summarises the proposed development.
- **Section 6** - summarises the relevant national and local planning policies, and other material considerations.
- **Section 7** – sets out the considerations for the proposal.



2. The Site and Surrounding Area

- 2.1 This section reviews the prevailing conditions of the existing site and the surrounding area, which are material considerations when assessing the suitability of the proposed development.

The Site and the Surrounding

- 2.2 The school is located at the southern edge of the town of Caerleon. The school site is accessible from Cold Bath Road and an unnamed road directly west of Caerleon AFC football pitch. Its west and north-west boundaries are defined by mature vegetation, whilst groups of trees and bushes define the eastern boundary. The site is rectangular in shape and with the overall redline area measuring circa 1.74 ha.
- 2.3 The school consists of various buildings ranging from 1 to 3 storeys. The original buildings date back to the 1960's, with alterations and extensions added since. The gymnasium block and headteachers block were constructed in the early 1970's. A 2 storey teaching block was constructed in the early 2000's and a number of portacabins have been added to the site throughout the years.
- 2.4 The application site is bound to the north by the Caerleon Cemetery, the Cold Bath Road allotments and the Caerleon A.F.C football pitch.

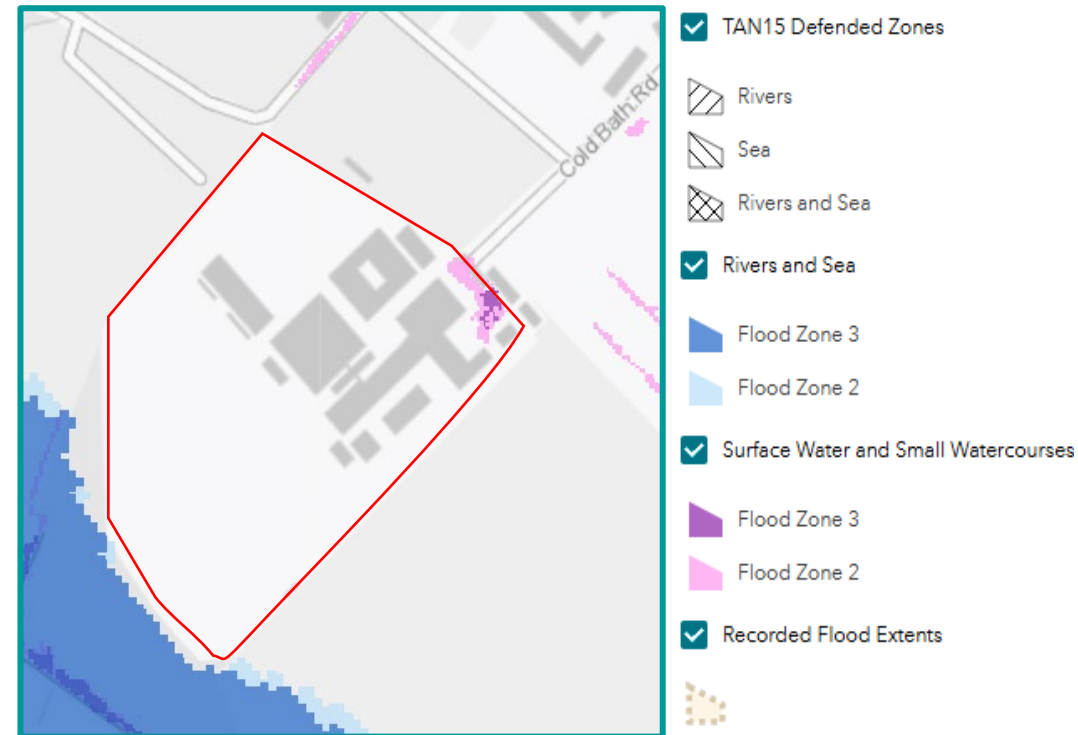
- 2.5 The extensive Caerleon golf course bounds the site to the west. Further to the south, the River Usk forms a natural curving boundary to the golf course.
- 2.6 Caerleon Rugby club is located to the south-east of the site, whilst the Roman Barracks sit to the north-east of the site. This is a particularly important historical site, which forms part of the Caerleon Roman Civil Settlement.
- 2.7 Apart from the Caerleon Golf Course, the site's wider surrounding area is characterised to the north-west by the grounds of St Cadoc's Hospital, beyond the railway line, and to the north-east and east by two storey residential properties.
- 2.8 The town of Caerleon is split in two by the railway line and has a residential character. It is centred around Goldcroft Common, and a small concentration of shops can be found at the intersection of the High Street and Mill Street, within walking distance from the application site.
- 2.9 Caerleon is the site of a Roman legionary fortress, Isca Augusta, and an Iron Age hillfort. Its great archaeological importance makes it a tourist destination and its key attractions are the Roman Amphitheatre, the National Roman Legion Museum, the Roman Fortress and Baths Museum, and the remains of the Roman Barracks including its fortress walls. As a result, the

application site is located adjacent to the Caerleon Conservation Area and several scheduled ancient monuments.

Flood Risk Considerations

- 2.10 Figure 2 provides an extract from Flood Map for Planning, showing that the majority of the site is not located within a Flood Zone whilst a very small hard surfaced area at the entrance to the site has been identified to be in Flood Zones 2/3.
- 2.11 Whilst it is acknowledged that the site is tightly bound by areas at risk of flooding, this is isolated to the existing playing fields, where no built form or changes are proposed. Areas of proposed development are confined to the existing built area of the school site.
- 2.12 The application is supported by a Flood Consequence Assessment that details compliance with 'Technical advice note (TAN) 15: development, flooding and coastal erosion' and LDP Policy SP3 (Flood Risk).

Figure 2: NRW Flood Map for Planning



Site Designations

Site designations

2.13 Figure 3 is an extract from the constraints and proposals map of Newport LDP, which shows the relevant designations of the site and its surroundings.

5.1 The school is located within the urban boundary of Caerleon. As illustrated in Figure 3, the application site is afforded the following designations:

- Caerleon Archaeologically Sensitive Area; and
- Caerleon Inset Area (northeast corner of the site only).

5.2 Figure 3 also demonstrates the extent of designations in proximity to the site, which include:

- Caerleon Archaeologically Sensitive Area;
- Caerleon Conservation Area;
- Scheduled Ancient Monument;
- Countryside;
- River Usk Special Landscape Area; and
- Area of Safeguarding of Mineral Resource.

Figure 3: Newport LDP Proposal and Constraints Map Extract – Surrounding Area



Caerleon Archaeologically Sensitive Area



Caerleon Conservation Area



Scheduled Ancient Monument



Countryside



River Usk Special Landscape Area



Area of Safeguarding of Mineral Resource

3. Planning History

3.1 Desktop research on the statutory planning register reveals 8 planning application records for the site. The details of the planning application records of the site are set out in Table 1 in the over leaf.

Table 1 – Planning application records of the site

Record Number	Reference	Description	Decision	Decision date
1	25/0812	Prior notification of demolition of buildings D1, D2, L, G, H, A (PARTIAL) K AND D3	Prior Approval Required	12/11/2025
2	25/0748	Placement of temporary sports hall	Permitted	30/10/2025
3	24/0163	Partial discharge of condition 2 (lighting) of 23/0985 installation of 8 floodlight columns and associated base/electrical works for 3G pitch	Permitted	11/04/2024
4	18/1123	Erection of weldmesh fence and gates up to 2.4 metres	Permitted	01/05/2019
5	18/0482	Replacement of 1no. pair of automated vehicular entrance gates and posts, installation of additional CCTV camera to pedestrian gate and installation of car reader intercom post	Permitted	10/08/2018
6	11/0571	Extension with pitched roof to existing standalone gymnasium and replacement of a window unit with a door in the headteacher's block	Permitted	02/02/2012
7	09/1158	Erection of external canopies for outdoor play	Permitted	13/01/2010
8	08/0945	Siting of portacabin	Permitted	21/08/2008
9	04/1402	Provision of cabin stacked on top of existing cabin which is to be relocated	Permitted	15/10/2004
10	04/1031	Provision of additional cabin to be stacked on top of existing cabin for use by Gwent Music support	Withdrawn	11/08/2004
11	03/1286	Erection of a two storey teaching block and relocation of tennis courts and associated drainage works	Permitted	03/12/2003

12	99/0360	Erection of a single storey infill building to provide 4 classrooms and a display area	Permitted	25/05/1999
13	97/0635	Siting of a demountable classroom	Permitted	06/08/1997
14	95/0413	Proposed siting of a double demountable classroom unit	Permitted	02/06/1995
15	93/0445	Proposed siting of a double demountable classroom unit	Permitted	16/06/1993
16	91/0222	Erection of single demountable classroom	Permitted	23/04/1991



4. Pre-application feedback

4.1 *Design, Massing & Location*

- No objections concerning the countryside, Special Landscape Area, Conservation Area, or nearby public routes.
- Existing single-storey buildings and demountables, deemed of little architectural value, can be removed.
- A new two-storey detached building is planned along the southeastern boundary, adjacent to existing playing fields.
- Site layout changes in the northern and southeastern corners aim to enhance on-site parking, impacting existing hard-surfaced courts and reducing available sports space.
- Policies CE3 (Environmental Spaces and Corridors) and CF1 (Protection of Playing Fields) must be met.
- Concerns include the southern elevation's closed-off appearance and the western façade's lack of openings, potentially leading to a bland and institutional look.
- Recommendations include reconsidering the southern façade to better engage with sports fields and adding articulation to the western façade for improved visual appeal and functionality.

4.2 *Heritage & Landscape*

- The proposed sports hall features a primarily brick design with a flat roof and modern windows, combining early 20th-century elements with contemporary touches.
- Brick is preferred over timber or stone, to maintain area consistency and preserve the conservation setting.

- Additional planting for screening is supported.
- The scheme is viewed as having minimal impact on the conservation area and scheduled monument.
- While outside the Conservation Area, the development affects its views, necessitating consideration.
- No Roman structures found during evaluation, but construction may impact archaeological resources at depths of 15.24m OD or deeper.

4.3 *Trees & Green Infrastructure*

- The Tree Constraints Plan acknowledges trees T5–T8 but lacks an Arboricultural Impact Assessment.
- Emphasis on canopy restoration and enhancement planting per LDP Policy GP5.
- Concerns about parking area disrupting green corridors; a review of the 25m gap for continuous infrastructure is suggested.

4.4 *Ecology*

- A Preliminary Ecological Appraisal identified one building as a confirmed bat roost, with others having potential features.
- Bat emergence surveys are advised, with full applications requiring reports on results and necessary mitigation measures.
- Plans should include measures for biodiversity net gain, beyond mitigating impacts on roosting bats.
- A Green Infrastructure Statement should reconcile ecological mitigation with landscaping and sustainable drainage.

- Potential impacts on nesting birds using affected buildings and trees are noted.

4.5 *Highways & Active Travel*

- No direct impact on Public Rights of Way (PROW), but nearby routes must remain accessible during construction.
- Proposed parking includes 65 car spaces (8 accessible, 13 EV charging), 3 minibus, 7 motorcycle, and 28 cycle spaces.
- An additional 59 car spaces via secondary access; total proposed is 124, slightly below the required 129.
- Increased use of secondary access, part of an active travel route, raises safety concerns due to potential conflicts.
- Upgrading the existing PROW/active travel route with hard paving is recommended to provide safe alternatives for cyclists and pedestrians.
- Engagement with the Active Travel Officer is encouraged to address these concerns.

4.6 *Contamination*

- Asbestos deposits identified; further information on risk assessment and management is required.

4.7 *Flood Risk, Air Quality & Amenity*

- The development area is not within a flood risk zone or Air Quality Management Area but requires access through an AQMA.
- Increased traffic is expected during off-peak hours; promoting sustainable transport modes and enhancing active travel routes is advised.

- Highway concerns need mitigation, as previously discussed.
- A sustainable drainage system plan must accompany the proposals.

4.8 *Conclusion*

- The development is acceptable in principle, offering enhancements to the educational site. However, detailed considerations regarding design, heritage, ecology, infrastructure, and sustainability must be addressed in the full application.

4.9 *Requirements for full planning include:*

1. Arboricultural Impact Assessment and Tree Protection Plan.
2. Arboricultural Method Statement
3. Soft landscape plan detailing planting constraints, species, and management.
4. Five-year maintenance plan for soft landscaping.
5. Hard landscape plan showing boundary treatments and surfaces.
6. A Green Infrastructure Statement is recommended to demonstrate positive outcomes and coordination on SUDS matters.



5. The Proposal

Overview

- 5.1 The proposal includes the construction of a new sports and teaching facilities, including altered parking arrangements and improved landscaping. The new building is proposed to be 2 storeys in height and is located adjacent to the south-eastern boundary of the school site.
- 5.2 Caerleon Comprehensive school's built form and learning spaces are dated. As a result, there is an urgent need to deliver a modern, fit for purpose, replacement learning block and sports facilities including upgrades to existing spaces in order to provide a new learning environment for students and a facility that the local community can use and benefit from.

Proposed spaces

Ground Floor

- 5.3 The ground floor is to house the main sports facilities and staff areas. This includes a double height sports hall, activity studio, fitness suite/weights room and a general classroom.
- 5.4 In addition to these spaces, the proposal also includes four main changing rooms, providing the opportunity for them be allocated to individual classes, teams, age groups, or designated as

required. Alongside these, there is a hygiene room that is proposed to double as an assisted change place' for school and/or community use, whilst a second smaller accessible change/shower room is located near the entrance to the building. These accessible rooms are located separate from pupils and community teams for safeguarding and double as staff/referee/coach changing.

- 5.5 There will also be a first aid room, with en-suite accessible WC, which will also be utilised by the school as a 'sick bay/nurse base' and is large enough for a stretcher/trolley.

First Floor

- 5.6 The first floor will house four general classrooms, and four specialist performing arts spaces (Drama/music). The northern drama studio overlooks the top of the activity studio which provides an opportunity to use this space as a control room for larger performances.
- 5.7 Each music/drama space has a dedicated practice room whilst a recording room is located between the larger music and drama rooms allowing it to be used for both, offering a good level of supervision.

5.8 Toilets for pupil use alongside an accessible / staff toilet, and drinking fountains, are located on the first floor as this is where the primary educational and pupil usage would be focussed.

5.9 Roof lights are also included, providing natural light to the inner practise rooms at first floor.

Roof Plan

5.10 To ensure lowest overall building heights and consistency with existing school buildings the proposal will include a flat roof. Rooflights are incorporated to introduce natural daylight into the inner first-floor practice rooms. A green roof is proposed, and indicative solar photovoltaic panels are shown at this stage. The requirements and configuration of the solar photovoltaic layout will be refined at the detailed design stage.

Design and Material Palette

5.11 The main built form of the proposed new learning space is two storeys, and in a rectangular shape with a flat roof to reflect the existing buildings onsite.

5.12 The proposed entrance to the building is to be dual use for both the school and community (out of school hours). In compliance with Building Regulations M, the entrance to the building is to be visually recognisable and includes a glass feature wall, canopy.

Adjacent to the entrance are bicycle stands, which help to identify the proposed access route.

5.13 The position of the new block parallel, to Block A (existing) allows for the creation of an improved courtyard area that acts as an external circulation and social space for pupils.

5.14 Aligning the buildings rhythm and creating balance, the proposal includes a corner window, which creates a focal point and provides views from the school bus stop area, whilst also offering natural daylight to the proposed activity studio.

5.15 In terms of the proposed material palette section 07 of the submitted DAS sets out the design approach to the selection of the external finish of brick, which offers both consistency with the existing built form of the school, as well as being durable and practical.

5.16 To create visual interest the proposal includes course capping at parapet level and a reveal emphasis using a secondary brick which emphasises the consistent recesses within the façade. The placement of windows and doors have been aligned in a grid form, allowing for a consistent Rhythm throughout the whole facade.

Figure 5: Proposed Design



Landscape Strategy

- 5.17 The external landscape is intended to operate as an extension of the school buildings, providing outdoor teaching and study areas alongside spaces for sport, play, socialising, relaxation and reflection. These external zones will integrate key access points into the buildings' circulation routes and accommodate congregation during break times.
- 5.18 The Courtyard area between the proposed block and A block will be broken up with rain gardens and planting, softening the feel of the area whilst also improving drainage.
- 5.19 The proposal also includes a new and improved MUGA area north-west of F block and an outdoor dining area between A block and F block.
- 5.20 Proposals also include the enhancement of green infrastructure features onsite which includes new grassland, ornamental planting, tree planting and the integration of bird, bat boxes and insect hotels.

- 5.21 Further details of the proposed landscaping can be viewed on the Landscape Plan submitted as part of the application submission.



6. Planning Policy

- 6.1 This chapter summarises the national and local planning policy framework, which is relevant to the proposed development.
- 6.2 All development should be in accordance with the statutory development plan, unless material considerations indicate otherwise, as required by s36 of the Planning and Compulsory Purchase Act 2004. In this context, the statutory development plan for NCC comprises the Newport City Council Local Development Plan adopted in January 2015.
- 6.3 National planning guidance (Planning Policy Wales Edition 12 and Technical Advice Notes) are material considerations. Other material considerations which should be considered are local Supplementary Planning Guidance (SPGs).

National Planning Policy

- 6.4 Regard has been had to the Government's Planning Policy Wales framework (PPW) and to the relevant Technical Advice Notes (TAN):
- Planning Policy Wales Edition 12 2024
 - Paragraph 3.3 to 3.5 (Good Design Making Better Spaces)

- Paragraph 3.19 and 3.24 (Promoting Healthier Places)
- Paragraph 3.49 to 3.52 (Accessibility)
- Paragraph 3.55 and 3.56 (Previously Developed Land)
- Paragraph 3.61 to 3.63 (Supporting Infrastructure)
- Paragraph 4.1.8 to 4.1.18 (Sustainable Transport)
- Paragraph 4.1.36 to 4.1.39 (Public Transport)
- Paragraph 4.1.50 to 4.1.54 (Car Parking)
- Paragraph 4.1.56 and 4.1.57 (Transport Assessments)
- Paragraph 4.4.1 to 4.4.5 (Community facilities)
- Paragraph 4.5.1 to 4.5.7 (Recreational spaces)
- Paragraph 5.8.1 to 5.8.7 (Sustainable Buildings)
- Paragraph 6.1.4 to 6.1.9 (Conserving and Enhancing the Historic Environment and its Assets)
- Paragraph 6.2.1 to 6.2.10 (Green Infrastructure)
- Paragraph 6.2.11 to 6.2.14 (Integrating Green Infrastructure and Development)
- Paragraph 6.3.12 to 6.3.17 (Characteristics of Local Landscapes)

- Paragraph 6.4.11 to 6.4.17 (Maintaining and Enhancing Biodiversity)
- Paragraph 6.4.37 to 6.4.44 (Trees, Woodlands and Hedgerows)
- Paragraph 6.6.1 to 6.6.8 (Water and Flood Risk)
- Paragraph 6.1.14 to 6.1.17 (Conservation areas)
- Technical advice notes:
 - TAN 5 – Nature Conservation and Planning (2009)
 - TAN 11 – Noise (October 1997)
 - TAN 12 - Design (2016)
 - TAN 15 – Development and Flood Risk (2004)
 - TAN 16 – Sport, recreation, and open space (2009)
 - TAN 18 - Transport (2007)
 - TAN 21 – Waste (2017)
 - TAN 24 – The Historic Environment (2017)

Local Planning Policy

6.5 The following policies are considered relevant:

- Newport Local Development Plan (LDP, adopted 28th January 2015)
 - SP1 Sustainability
 - SP2 Health
 - SP3 Flood Risk
 - SP8 Special Landscape Areas

- SP9 Conservation of the Natural, Historic and Built Environment
- SP12 Community Facilities
- SP14 Transport Proposals
- SP18 Urban Regeneration
- GP1 Climate Change
- GP2 General Amenity
- GP4 Highways and Accessibility
- GP5 Natural Environment
- GP6 Quality of Design
- GP7 Environmental Protection and Public Health
- SP4 Water Resources
- SP9 Conservation of the Natural, Historic and Built Environment
- T4 Parking
- W3 Provision for Waste Management Facilities in Development

6.6 Other material considerations include:

- Newport City Council Supplementary Planning Guidance Archaeology & Archaeologically Sensitive Areas (August 2015)
- Newport City Council Supplementary Planning Guidance Parking Standards (August 2015)
- Wildlife and Development (August 2015)

- Trees, Woodland Hedgerows and Development Sites (January 2017)
- Outdoor Play Space Provision (January 2017)
- Development Management Air Quality (February 2018)



7. Planning Considerations

- 7.1 This section provides an assessment of the scheme against the NCC Local Development Plan and explains the considerations in the design of the proposal.

Principle of development

- 7.2 Paragraph 1.18 sets out the objectives of Newport Local Development Plan (LDP) 2011-2026, namely an objective of “*A Learning and Working City - The LDP recognises the importance of education and will help to protect and develop schools for the future...*”
- 7.3 As the application site is already in use as a school (Use Class D1, education), the improvement of existing school facilities is considered an acceptable evolution of the site and is in accordance with **LDP Policy CP13**.
- 7.4 Similarly, in line with the requirements of **LDP Policy SP1 (Sustainability)** the proposal makes efficient use of brownfield land in a sustainable location that is located within the settlement limits of Caerleon. Whilst the proposal will also improve “*facilities, services and overall social and environmental equality of existing and future communities.*”

- 7.5 **LDP Policy SP12 (Community Facilities)** encourages the development of new community facilities in sustainable locations. The site’s existing academic use lends itself to the provision of new and improved community and learning facilities. The proposals consist of high-quality sports and recreation facilities, which will be available for both public and academic purposes.

- 7.6 Whilst the development site is not within a Special Landscape Area, it is bound on the southern, eastern and western edges by the River Usk LSA. **Policy SP8 (Special Landscape Areas)** states:

“Proposals will be required to contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area’s special features.”

- 7.7 The proposal is considered to be of a high-quality design, replacing what is considered to be poor quality education buildings. The school site is well established and buffered by existing vegetation on boundaries opposite the SLA. As such, the impact on the SLA is considered to be no more than already exists.

Access and Parking

7.8 **LDP Policy GP4** sets out the general development proposals in terms of highways and accessibility considerations. Whilst **Policy T4 (Parking)** explains that development will be required to provide appropriate levels of parking within defined parking zones in line with adopted standards.

7.9 The application site is in zone 3 and as such, in line with current staffing and pupil numbers, as demonstrated by the supporting Transport Statement, there would be the requirement for a maximum of 129 parking spaces onsite.

7.10 Despite this requirement there are currently 90 car parking spaces provided at the school, a shortfall of around 39 spaces when compared against the Council's adopted Parking Standards.

7.11 As the Transport Statement explains the proposal will include:

“Significant improvements will be made to the school's parking arrangements. A total of 65 car, 2 minibus and 7 motorcycle parking spaces will be accessed from the school's main entrance. The 65 car parking spaces include 8 accessible spaces for blue-badge holders and 13 EV charging spaces. Car sharing will be encouraged with 7 spaces (5%) to be prioritised for car-sharers. Also,

28 new cycle parking spaces will be provided. An additional 59 car parking space will be available from the school's secondary access.”

7.12 As a result, the proposal includes a total of 124 parking spaces (inclusive of 10% EV charging, as required by Policy 12 of Future Wales) and 82 cycle parking spaces, which align closely with the maximum parking standards set out within the Newport City Council Supplementary Planning Guidance Parking Standards (2015).

7.13 Further justification in relation to parking provision is set out within the Transport Statement and Travel Plan, which has been submitted alongside this application.

7.14 In line with the pre-application feedback, the proposal also seeks to formalise the connection alongside Caerleon AFC football fields (PRW - 389/4/1) providing a safe pedestrian connection between the school entrances for pupils, but also the wider community, in using the rights of way in the vicinity of the site.

7.15 The applicant is currently in discussions with NCC to agree the most appropriate solution and means of delivery for these improvements. Such a proposal is supported by LDP **Policy T6 (Public Rights of Way Improvement)** which encourages improvements of existing public rights of way.

Conservation and Archaeology

7.16 **LDP Policy CE7** identifies the site as being directly adjacent to Caerleon Conservation Area. Policy CE7 sets out a criterion-based policy for developments in Conservation Areas:

- 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. use materials which are traditional, or appropriate to their context.*
- iii. *Complement or reflect the architectural qualities of nearby buildings which make a positive contribution to the character of the area.*
- iv. *Pay special attention to the settings of buildings and avoid the loss of any existing domestic gardens and open spaces which contribute to the character of the area.*
- v. *Avoid adverse impact on any significant views, within, towards and outwards from the conservation area.*

7.17 The site is also adjacent to a number of Scheduled Ancient Monuments, namely Caerleon Legionary Fortress and Caerleon

Civil Settlement. Despite this the proposal is not considered to directly impact these historic assets.

7.18 The proposed material palette and design of the proposal has considered the rhythm and materiality of the conservation area as identified by the 'Caerleon Conservation Area Appraisal.' The proposal therefore includes a rhythmic approach to fenestration, with the brickwork being complementary to both the existing school buildings but importantly features of the conservation area and local historic buildings, such as the Former Caerleon College Campus.

7.19 In this regard, the design proposal's eastern elevation sits along the border of Caerleon's Conservation Area and will be partially (seasonally) visible from the adjacent sports fields. The proposed material palette has therefore been chosen to be respectful to the Conservation Area boundary.

7.20 Building on public views into the site, these are limited to the road that bounds the Caerleon AFC football pitch, the southern stretch of Cold Bath Road (part of the CCA) and long distance views from the Broadway (also part of the CCA). These long distance views are more prevalent in the winter months where seasonal screening is less significant.

- 7.21 The extent of the proposals impact on key views out of the Conservation Area are demonstrated on pages 86-88 of the submitted Design and Access Statement.
- 7.22 An 'Archaeological field evaluation' completed in January 2012 concluded that no structures of Roman date were encountered during the course of the evaluation. However, it did identify two archaeological significant deposits:
- **Deposit 1006** - Likely to represent a roman occupation layer, contained Roman ceramics including decorated Samian bowl sherds, Caerleon ware flagon fragments and colour coat beaker fragments, the ceramics dating from mid 1st century AD to 4th century AD.
 - **Deposit 1004** -A levelling deposit containing a Post-medieval assemblage, which included ceramics dating to the 18th and 19th centuries.
- 7.23 The study found that whilst no structures were identified on-site the construction work will likely have an impact on the archaeological resource. As such, *“the critical depth of the Roman deposit is 15.24m OD, and any ground intrusion works at this depth or deeper, will encounter this archaeologically significant deposit and require appropriate mitigation.”*

- 7.24 **LDP Policy CE6 (Archaeology)** states that the Council will normally require an Archaeological Impact Assessment, before making a decision in areas of recognised archaeological interest. The proposed areas of the works are on areas where buildings have already existed. As such, it remains of low probability that any archaeological remains would be discovered. Nevertheless, there will be a need for careful construction, and we propose that a pre-commencement condition of a Construction Environmental Management Plan (CEMP), that has a requirement for a hand dig in places is imposed to ensure that in the event any remains are found, these would be recorded.

Ecology and Biodiversity

Protected sites

- 7.25 No part of the site is within a statutory designated site of conservation value (SSSI, SAC, SPA or NNR). However, the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is located approximately 550 metres to the west of site. As confirmed by ethos environmental planning within the supporting Green Infrastructure Statement it is not anticipated that the River Usk and connecting habitats will be impacted by the proposals.

Protected species

7.26 On the 19th of June 2024 Ecology Wales published their Preliminary Ecology Appraisal (PEA) in relation to the Caerleon Comprehensive School site. The PEA found that the Caerleon Comprehensive School site comprises of habitats of low ecological value.

7.27 From an inspection of buildings onsite and in relation to the proposed development buildings D3, A & G, the PEA considered there to be a low potential for roosting bats. Buildings D1, D2, & H are of Moderate potential to support roosting bats whilst building K has a confirmed bat roost.

7.28 Following the recommendations of the PEA and in accordance with current best practice guidelines, the following surveys have been completed and have been finalised:

- Three dusk emergence / re-entry bat surveys of the building K.
- Two dusk emergence / re-entry bat surveys of the buildings D1, D2 & H.
- One dusk emergence / re-entry bat survey of buildings D3, A & G.

7.29 The aforementioned Bat Surveys were completed between July/August/September 2024 the findings of which are summarised:

- As the building has a confirmed small Common pipistrelle summer roost, an NRW species development licence for work affecting bats or their resting places will be required.
- A detailed precautionary working/demolition method statement is recommended.
- Prior to commencement of demolition works of the buildings, x4 Beaumaris Woodstone Bat Box (or similar specification e.g. Schwegler 1FF) will be erected initially on nearby trees at a height of 3 metres, and on the southeast elevation of new building at a height of no less than 3m, just under the eaves.

7.30 Furthermore, ethos environmental planning conducted an updated structures inspection on 29th October 2025, to assess any notable changes to structures on site and inform licensing requirements. The inspection found:

- A single pipistrelle bat was observed roosting within the structure of building K at the same feature as recorded during the 2024 emergence surveys.
- Two bat droppings were found on the wall and door frame of the north elevation of building D1 beneath a space behind fascia boards with a grill along the bottom,

several holes along the length of the grill allow bats ingress to the space behind the fascia. The feature is considered to support low numbers of pipistrelle bats in line with other roosts found on site.

- 7.31 The inspection concluded that no other evidence of bats were recorded during the inspection of the remaining structures, with no significant changes to the structures since the previously recorded inspection.

Green Infrastructure

- 7.32 In line with paragraph 6.4.8 of PPW, this application is supported by a Green Infrastructure Statement that details the stepwise approach to the formulation of the site layout and landscape strategy. In doing so, the Statements sets out the ecological benefits of the proposed green infrastructure interventions in order to create Green Infrastructure Net Benefit.

- 7.33 Through the integration of green infrastructure into the proposals design strategy it is considered that the proposals support the delivery of **GP5 (General Development Principles – Natural Environment)** which requires proposals to enhance the sites green infrastructure and biodiversity networks.

- 7.34 **Arboriculture**

- 7.35 **LDP Policy GDP 5 (General Development Principles – Natural Environment)** requires proposals to include appropriate tree planting or retention where appropriate and seeks to ensure proposals do not result in the unacceptable loss of or harm to trees, woodland or hedgerows that have wildlife or amenity value.

- 7.36 A Tree Survey, Categorisation & Constraints Report was prepared by Steve Ambler and Sons Ltd in June 2024. The Report has been carried out in accordance with the standards set out in BS 5837:20121 (items 4.4, 4.5 & 4.6) and gathers tree related information to assist the Local Planning Authority in their decision-making process, in the context of design, demolition and construction.

- 7.37 The report found that there are no Category A Trees on-site and 30 Category B Trees that are located either in the site or in close proximity to the site as illustrated in the Tree Survey, Categorisation & Constraints Report. These trees offer screening of views both into and out of the site.

- 7.38 The Report found that the remaining trees are not considered to be of any particular arboriculture or visual merit, are below the threshold of 75 mm diameter when measured at 1.5 metres above ground level or are in poor condition and have been allocated retention categories C or U.

- 7.39 The Report recommends that efforts should be made to retain category B trees. Whilst category C trees should be retained if desired. The Report also highlights a number of category U trees that should be removed as part of the sites development and evaluated through a site risk assessment in the sites existing form.
- 7.40 To enable the proposed new-build block, there is a requirement to fell a number of category B tree numbers, these are T5, T6, T7 and T8. Whilst the Report identifies these tree numbers to be considered for retention (moderate), these trees conflict with the proposed footprint of the new block.
- 7.41 To ensure the protection of existing trees onsite during construction works, the application is supported by a Tree Protection Plan and combined Arboricultural Implications Assessment/Method Statement which details clear recommendations and concludes that proposal will have a negligible impact upon the amenity value of existing trees. Compliance with the proposed Method Statement can be controlled via a suitably worded planning condition which will ensure that harm to existing trees on site is avoided and limited as far as possible.
- 7.42 Efforts to mitigate the impact of the loss will be made through tree planting as set out in the submitted Landscape plan, which

will be in line with Paragraph 6.4.42 of PPW provides a 3:1 replacement resulting in the planting of 13 new trees on-site.

Inclusive design

- 7.43 As the proposal is a school site there is an ongoing commitment to meet the needs of all users, ensuring that that the premises are fully inclusive. The guidance in Part M is to be followed across both the internal and external spaces.

Sustainability

- 7.44 The proposal includes the use of roof mounted solar photovoltaic panels as well as elements of natural ventilation, supporting the transition to a low carbon future in a changing climate. The proposal is also targeting a BREEAM score of excellent.
- 7.45 It is considered that the proposal will therefor address LDP **Policy GP1 (Climate Change)**.



8. Summary

- 8.1 This Planning Statement has been prepared to support the proposal for the construction of new sports and teaching block, including altered parking and improved landscaping at Caerleon Comprehensive School.
- 8.2 The statement provides an overview of the proposal, accompanied by site and surrounding details and background to the proposal. It sets out the relevant considerations and pre-application advice that informed the proposal and summarises the ecological, Arboricultural and heritage constraints.
- 8.3 The architectural design of the new care home building has considered the site's physical constraints, the operational requirements of the school, as well as the well-being of future pupils. It complies fully with the latest relevant accessibility and educational standards. The new building is expected to meet the statutory requirements and provide a modern and engaging learning environment for pupils, staff and visitors alike, an improvement from the dated teaching facilities that are to be replaced.
- 8.4 Accordingly, the proposal represents an acceptable form of development that complies with the relevant policies. It is for these reasons that Newport City Council is respectfully

requested to grant planning permission for the proposed development.

Appendix 1 - Pre-application advice received



NEWPORT
CITY COUNCIL

CYNGOR DINAS

CASNEWYDD

Ask Joanne Davidson
for/Gofynnwch
am

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By email only

20th January 2025

Dear Ms Williams

PROPOSAL: PRE APPLICATION PLANNING ENQUIRY FOR Demolition of blocks D1 (Learning Hub), D2 (Drama), D3 Peri, G (WBQ), H (Gym), K (Conference) and L (Caretaker house), partial demolition and repurposing of blocks A/B/C (Main block) and creation of new sports and teaching facilities

SITE: Caerleon Comprehensive School Cold Bath Road Caerleon
Newport South Wales

APPLICATION TYPE: Pre-app Non Stat Enquiry

I refer to your recent request for pre-application advice in respect of the above. In formulating this response I have had regard to comments obtained from the parties listed below:

1.	Principal Heritage Officer	Newport City Council
2.	Ecology Officer	Newport City Council

3.	Landscape - Gill Mackley Davies	Newport City Council
4.	Public Rights Of Way - Leah Young	Newport City Council
5.	Tree Officer (Dev Sites) - S Carle	Newport City Council
6.	Highways	Newport City Council

Although Environmental Health and Waste Officers were consulted on this pre application enquiry, no response has been received from these Service Areas at time of writing. Should comments of relevance be received after letter issue, I will forward them separately as necessary.

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice any formal decision of the Council in respect of any application, on which a more extensive consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to officers.

Relevant Site History

You have outlined this in supporting documents and are clearly familiar with site history so I will not duplicate here.

Site Constraints / Designations

As per above, the enquiry is supported by several documents that show awareness of site constraints. We have also met on site and discussed this project pre-enquiry submission and supporting documents clearly have regard to key constraints applicable in this case. These include the following:

- Archaeology, as adjacent to archaeologically sensitive area and Scheduled Ancient Monument designation(s)
- Flood risk
- Landscape impact as site has multiple tree and hedgerow features and abuts Special Landscape Area and is urban fringe
- Highways impact by reason of reconfigured layout and provision of additional parking off secondary access point.
- Design and massing as abutting Caerleon Conservation Area and countryside
- Ecological impact as demolition is proposed and some landscape works likely
- Other constraints include proximity to natural greenspace, active travel routes and public right of way, access via Caerleon Air Quality Management Area and general amenity and accessibility considerations.

Relevant Policy Context and material considerations

Section 5 of the Pre Application Planning Statement sets out relevant national and local planning policy, technical advice and supplementary planning guidance and I see no reason to duplicate that here.

Officer Assessment

The project subject of this enquiry is described as follows in the Pre Application Planning Statement:

The proposal includes the demolition of blocks D1 (Learning Hub), D2 (Drama), D3 Peri, G (WBQ), H (Gym), K (Conference) and L (Caretaker house), partial demolition and repurposing of blocks A/B/C (Main block) and creation of a new sports and teaching facilities. The new building is proposed to be 2 storeys in height and is located adjacent to the south-eastern boundary of the school site.

In addition to this we are told that:

The existing access points to the school will remain unaltered...Significant improvements will be made to the school's parking arrangements. A total of 65 car, 3 minibus and 7 motorcycle parking spaces will be accessed from the school's main entrance. The 65 car parking spaces include 8 accessible spaces for blue-badge holders and 13 EV charging spaces. Car sharing will be encouraged with 7 spaces prioritised for car-sharers. Also, 28 new cycle parking spaces will be provided. An additional 59 car parking space will be available from the school's secondary access...In total therefore the site will accommodate 124 car parking spaces.

Numerous supporting documents and drawings have been provided as part of this enquiry and internal Council consultations have been undertaken on this basis. Those consulted are noted above.

A site walk-over has already taken place and the purpose of the project is understood. A short meeting to discuss the project and this response took place earlier today. The site is an operational comprehensive school located within the urban settlement boundary. It was evident at site visit that areas of the school are in a poor physical condition and there are some shortcomings in terms of parking availability and general legibility on site.

The submitted Design and Access Statement details the work that has been undertaken prior to this enquiry in formulating the scale, location and extent of the project and its preferred design.

There are approximately 1,500 pupils on the school roll. There are some 150 members of staff, including 88 teaching staff, 26 teaching assistants and support staff. We are advised that this will not change and the purpose of the project is not to increase school capacity.

From visual inspection there is clear merit in the demolition of end of life units on site and the construction of a new building will offer enhanced educational facilities on an existing school site. This will be afforded significant weight in the decision making process. There is no objection to the proposed demolition works.

However, the site has several constraints and the scheme will need to be considered having regard to relevant adopted planning policy and material planning considerations. In practice this will mean that the quality of information and supporting documentation accompanying the submission will be critical to the consideration process. Good quality, accurate and comprehensive supporting documents can avoid delays in the determination of a planning application. With this in mind, the documents submitted with this enquiry are very helpful and detailed and must be submitted with the associated planning application, updated as required and in response to this pre application advice and any statutory pre application process. I will confirm any further information considered necessary or helpful in this response.

Policy SP12 is the key strategic policy of the current adopted LDP relevant to this project:

SP12 Community Facilities

THE DEVELOPMENT OF NEW COMMUNITY FACILITIES **IN SUSTAINABLE LOCATIONS WILL BE ENCOURAGED** INCLUDING:

- i) PLACES OF WORSHIP AND CHURCH HALLS, CEMETERIES, COMMUNITY CENTRES, HEALTH CENTRES, DAY NURSERIES, CLINICS AND CONSULTING ROOMS;
- ii) MUSEUMS, PUBLIC HALLS, LIBRARIES, ART GALLERIES, EXHIBITION HALLS, **EDUCATION** AND TRAINING CENTRES;
- iii) CINEMAS, MUSIC AND CONCERT HALLS, THEATRES, DANCE AND SPORT HALLS, SWIMMING BATHS, SKATING RINKS, GYMNASIUMS;
- iv) **OUTDOOR AND INDOOR SPORT AND LEISURE USES** INCLUDING ALLOTMENTS AND COMMUNITY/ CITY GARDENS. **DEVELOPMENT THAT AFFECTS EXISTING COMMUNITY FACILITIES SHOULD BE DESIGNED TO RETAIN OR ENHANCE ESSENTIAL FACILITIES.**

This is a positively worded policy and it is clear that the development proposed is acceptable in principle.

In my view the key considerations of any planning application based on the policy framework and site constraints identified above, will be as follows:

- Massing, Scale, Design and Location
- Impact upon existing trees and hedgerows
- Impact upon biodiversity interests
- Impact upon active travel, highway safety and parking
- Impact upon heritage considerations including archaeology

Secondary matters, based upon the information provided (notably the fact that school capacity will not increase) in my view are:

- Flood risk
- Air Quality
- Residential amenity

Massing, Scale, Design and Location

Numerous areas of the existing school site are impacted by the works. The project will be clearly visible from countryside, Special Landscape Area, Conservation Area and nearby public routes. Secondary buildings along the south eastern and south western boundaries will be demolished in their entirety. In relation to the above consideration, there is no objection to these works. The buildings are in poor condition, contribute little to the site aesthetic and their removal will have a positive impact upon site appearance in my view. The Principal Heritage Officer concurs with this view as has advised:

The buildings on the site are of little architectural value, being of late 20th/early 21st century and are typical of school building of this time. They are generally of red brick or concrete with flat roofing or very shallow pitches. In principle, I have no objection to the removal of the various single storey buildings and demountables on the site. Most are visually unpleasant and do not provide positive views out of the conservation area.

A large new detached building of 2 storeys will be constructed along part of the south eastern boundary adjacent to the existing playing fields. This is the most notable element of the proposal in visual terms and I will discuss this further below.

Alterations to site layout are proposed in the northern and south eastern corners of the site. The purpose of these works is to enhance on site parking. To the north, this will impact existing hard surfaced courts by reducing the number and space available for them. I am of the view that the provision of parking will reduce sports space provision and consequently Sport Wales will likely be a statutory consultee on any planning application (even if this is not clear we will consult them as a precautionary approach) and Policy CF1 will be applicable. Furthermore, part of the area of these works is defined as Environmental Space on the LDP Proposals Map. Policy CE3 is therefore also relevant. For the avoidance of doubt, the relevant policies state:

CE3 Environmental Spaces and Corridors

IN AND ADJOINING THE URBAN AND VILLAGE AREAS, AND IN AREAS IDENTIFIED FOR COMPREHENSIVE DEVELOPMENT, SITES HAVING EXISTING IMPORTANCE FOR THEIR VISUAL QUALITIES, AS WILDLIFE HABITATS OR FOR RECREATIONAL OR AMENITY PURPOSES, WILL BE SAFEGUARDED AS "ENVIRONMENTAL SPACES AND CORRIDORS". DEVELOPMENT IN THESE SPACES WILL BE PERMITTED ONLY WHERE:

- i) THE EXISTING OR POTENTIAL ENVIRONMENTAL QUALITIES OF THE SITE WILL BE IMPROVED OR COMPLEMENTED;
- ii) THERE IS NO ADVERSE IMPACT ON INTERNATIONAL, EUROPEAN, NATIONAL, REGIONAL OR LOCAL NATURE CONSERVATION INTEREST;
- iii) THERE IS NOT A LOSS, WITHOUT APPROPRIATE REPLACEMENT, OF A RECREATIONAL, OPEN SPACE, OR AMENITY RESOURCE FOR THE IMMEDIATE LOCALITY UNLESS IT CAN BE DEMONSTRATED THAT THERE IS AN EXCESS OF PROVISION OR FACILITIES CAN BE ENHANCED THROUGH DEVELOPMENT OF A SMALL PART OF THE SITE. PROPOSALS TO ENHANCE OR IMPROVE EXISTING ENVIRONMENTAL SPACE PROVISION WILL BE

ENCOURAGED WHERE PRACTICABLE. ADDITIONAL PROVISION WILL BE
SOUGHT IN AREAS WHERE A DEFICIT HAS BEEN IDENTIFIED

CF1 Protection of Playing Fields, Land and Buildings Used for Leisure, Sport, Recreation and Play

THE REDEVELOPMENT FOR OTHER PURPOSES OF PLAYING FIELDS, OTHER LAND AND BUILDINGS USED FOR SPORT, RECREATION, AREAS OF PLAY AND COMMUNITY USES, WILL ONLY BE PERMITTED WHERE:

- i) ALTERNATIVE PROVISION OF THE SAME BENEFIT IS MADE AVAILABLE IN THE IMMEDIATE LOCALITY; OR
- ii) THE LAND OR BUILDING(S) IS SURPLUS TO REQUIREMENTS.

Both the above policies will need to be met. I note previous works to create a MUGA at the school site and proposed works to enhance indoor sports provision that will be available to the wider community outside school hours. I am also aware that the parking works only affect part of the existing court provision, the majority are retained and are potentially enhanced. Nonetheless, I recommend that this matter be addressed in any supporting information, likely an updated Planning Statement. I will consider matters of biodiversity and landscape impact elsewhere in this response (i.e. relevant to CE3 criteria (i) and (ii)). I will consider matters of highways and parking specifically elsewhere in this response. However, insofar as the impact of parking expansion works upon general visual amenity is concerned I consider any change to visual receptors is unlikely to be of significant harm compared to the existing situation and the works unto themselves are unlikely to adversely impact the setting of the Caerleon Conservation Area and Scheduled Ancient Monument. Cadw will be a statutory consultee on the latter and may take a different view.

There are some issues arising in relation to impact upon landscape features and screening but I will deal with these in more detail in the relevant landscape section of this response.

Turning then to the most notable element of the project in design and massing terms, that being the new detached building. The Principal Heritage Officer has commented as follows:

The proposed sports hall would comprise of mostly brick and would have a flat roof. The fenestration would be modern but not overly stand out, and the general architectural design would have somewhat an early 20th century feel, with a contemporary twist. The design and access statement provides options for design and materials which includes timber clad and stone. Given there is little of this material on the site, it may give the building an overly complex and contrastingly modern appearance, and I'd consider the sole use of brick as proposed to be the better option. It would ensure better preservation of the setting of the conservation area. Regarding size and location proposed, I would consider this acceptable in principle. Nevertheless, I would recommend that further view analysis and impact on the setting of the conservation area is done, as it is not completely clear how much this protected setting will change as a result of the proposed development. Additional planting along the boundary is supported to act as screening.

Overall, however, I am generally supportive of the scheme and would consider there to be minimal impact on the setting of the conservation area and scheduled monument.

The NCC Landscape Officer adds:

... the south facing elevation is fairly blank ... Shading from the new block onto the courtyard should be analysed and I have a slight concern the position alongside block A will create a wind corridor.

From my own observations, Caerleon Comprehensive School is characterised by brick buildings and I concur with the view of the Principal Heritage Officer in suggesting that a simple materials palette is preferable and introduction of uncharacteristic finishes is unlikely to be beneficial. I would not recommend the use of timber or stone in this context. I would also not recommend the use of grey or buff bricks. I appreciate some are evident on site but I do not consider them beneficial. Brick is known to be a robust material, suitable for this type of use and a development that includes it as the primary finish is appropriate in my view. However, the building is of large scale, flat roof form and is open to public view. Other brick buildings on site are of more traditional form and have used a variety of techniques to break up the monotony of brick work to mixed success. Some appear very dated. I also note that the southern elevation has a high solid to void ratio and large expanses of brick can appear rather bland and oppressive. The focus of openings on the shaded north elevation is of some concern and perhaps needs further review. The Landscape Officer clearly notes this too in stating the south facing elevation is quite blank. Although this elevation has beneficial views across the sports fields, it offers a closed façade with the active elevation facing north towards existing school buildings rather than engaging with the fields to the south. I cannot help but think this is a missed opportunity, particularly noting the proposed gym and recreational facilities that will be provided at ground floor. The southern elevation looks particularly institutional and I would encourage reconsideration of this façade. I note the relief offered by the vertical recesses and have no objection to this in design terms but some areas may benefit from one other material or finish such as cladding that will integrate with the brick finish and offer further visual relief. This was negotiated and, in my view, worked well on another school scheme at St Andrews Primary for example. Additional or larger openings in the southern façade should also be considered.

The western façade has no openings as serves the sports hall. High level openings are shown on other elevations of the hall so I am not entirely clear why they are absent on this end wall. This may not be problematic but the vertical recesses by themselves would offer a very bland elevation to the sports fields west of the buildings and will remove the benefit of sunlight into this space during the school day and give a lack of active frontage to this part of the school circulation area. The scale and flat roof of this elevation will look very box-like and additional articulation would be welcomed with consideration to how this part of the school grounds will function in the longer term.

I note the design precedents cited in the DAS which are useful. These photos demonstrate the benefit of natural light in sports hall and gym situations without prejudicing usability:



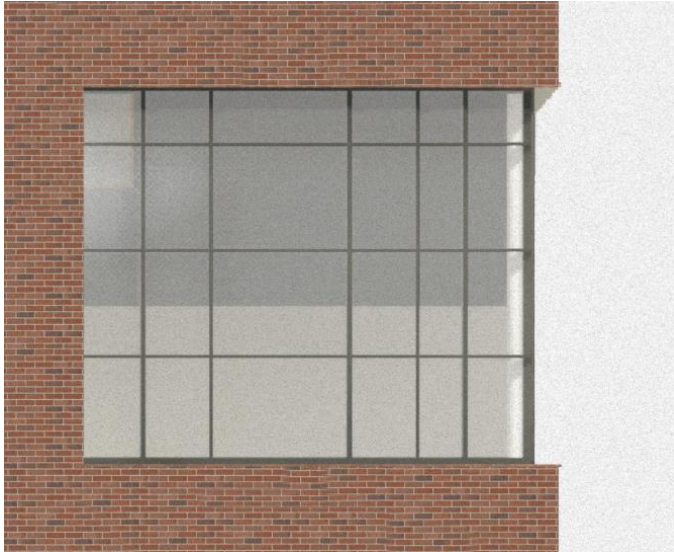
The Godolphin precedent also shows us how 2 materials or 2 material types, vertical recesses and windows can contribute to the external view without compromising the internal function and encourage visual interaction with the outside sports space.



The Landscape Officer points to a potential wind tunnel effect arising from the orientation, location and massing of the building south of the existing multi storey teaching block to be retained. This is a valid point in my view and warrants further consideration.

I note the main entrance will be created on the eastern façade. This will be the new main entrance for the school and I note this will offer a large multi storey glazing feature with protruding canopy feature. This aspect will be visible primary from within the school itself and less open to wider public views. There are no concerns with this in principle but the Local Planning Authority would be interested to understand the use of reveals, type of glazing, frames, bars etc that will be used. The protruding canopy is a contemporary feature so use of colour and material here could make a bold statement. The stepped façade will offer some solar shading to this galleried space which appears to comprise an open foyer and staircase.

The wrap around glazing shown as serving the activity or drama studio is located at high level and by reason of orientation will flood this space with natural day and sunlight for most of the school day. There does not appear to be any attempt at solar shading (other than what may be achieved by existing landscaping along the southern boundary. There are no objections to the feature but by reason of its size and prominence would be keen to understand reveal details, glazing type (whether clear or coloured), frames and bars etc. The elevations appear to suggest a large reveal that I would welcome. However, this is less clear on the floor plan. How will these reveals be finished as they will be clearly visible?



On the whole, there is no objection to a two storey, flat roof building of predominantly brick construction, of the size proposed in this location. I am of the view that there are aspects that may need further consideration including the materials palette, the arrangement of the southern elevation, the finishes and openings (or lack of) on the western and southern elevations, the fine detailing of large glazing features and the general arrangement, focussing upon the shady northern elevation as the active space in the knowledge that the building itself will encourage more shading in this key circulation area and potentially contribute to wind tunnelling.

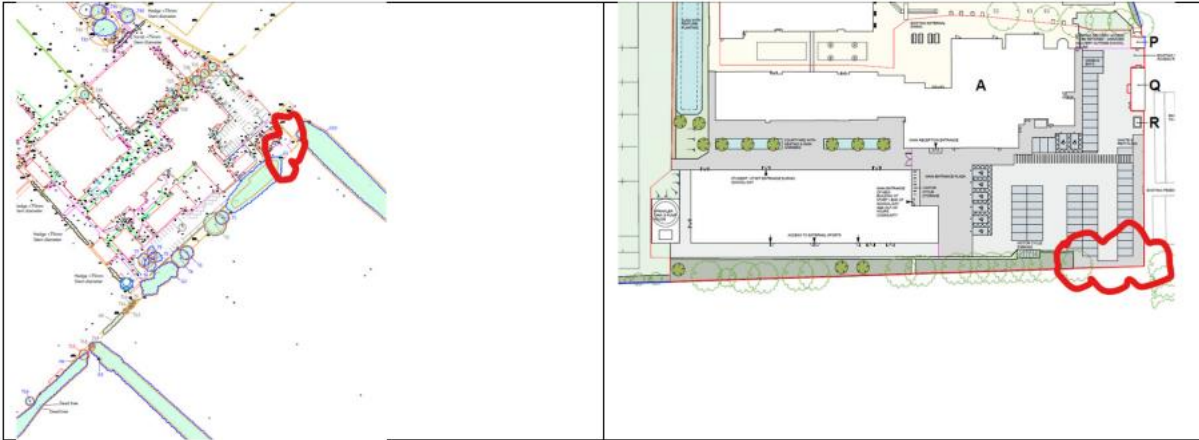
Impact upon existing trees and hedgerows

The Landscape Officer confirms as follows:

The Tree Constraints Plan by Steve Ambler June 2024 is welcome.

The Planning Statement refers to felling of T5,6, 7, 8 although there is no Arboricultural Impact Assessment and these are not identified on the Landscape GA Plan. Noted that 12 trees are proposed to meet the 4no losses. From a landscape view, mitigation replacement is not required at a fixed 3 to 1 ratio, rather replacement of the canopy is important to identify and whether trees should be individual or grouped, and how mitigation and enhancement planting fits in with the wider green infrastructure etc. Planting should incorporate enhancement planting to meet LDP Policy GP5.

The parking area extends south to prevent a west-east green corridor meeting a north-south corridor, can this c25m gap be reviewed to enable continuous green infrastructure links.



At full planning the following will be required:

- 1. Arboricultural Impact Assessment and Tree Protection Plan.*
- 2. Provision of a soft landscape plan to meet LDP Policy GP5 showing: - any constraints to planting - detailing of plant species, size, density, location; outline specification for ground preparation and planting including consideration of working within root protection areas - showing and labelling key tree and hedge groups from the Tree Constraints Plan - adjacent land-use labelling to show the site context more clearly - showing tree/hedge removal*
- 3. A five year soft landscape maintenance and management plan to include retained trees and other vegetation.*
- 4. A hard landscape plan showing boundary treatment, hard surfacing, any slopes and retaining walls.*

The NCC Tree Officer adds:

Details of existing trees proposed for removal are required .

Tree/hedge information including Root Protection Area(RPAs) must be consistent across all layout plans and include RPAs ie tally with the submitted tree numbering in the Tree Report.

The RPA is a minimum exclusion area based on tree stem diameters only.

As always, the RPA is not the nearest place that development can take place.

There appears to be an incursion into the RPA of G1 (Tree report) ie proposed car and motorcycle parking and incursion into the RPAs of trees within G9 - see image below.

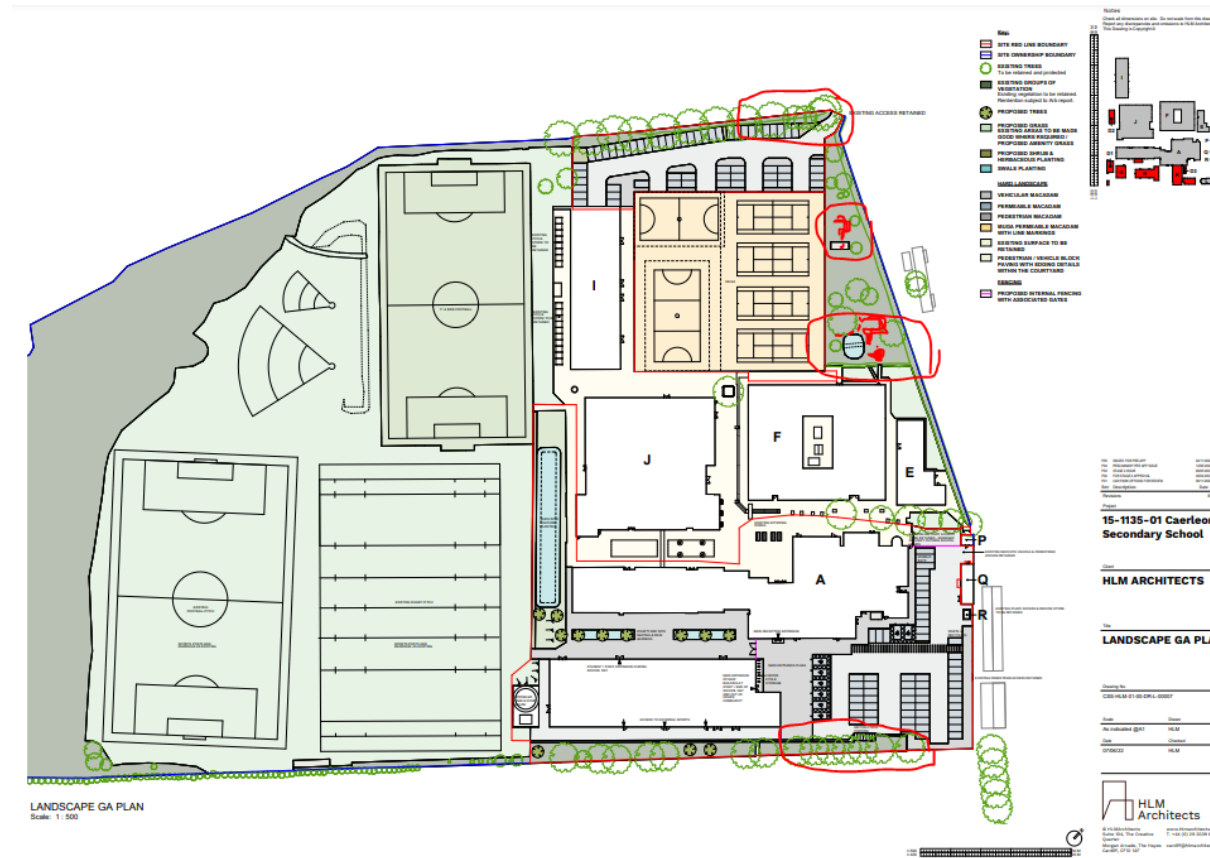
It should be confirmed that no proposed services bisect the RPAs.

Is there a proposed wall to the front of G1?

A proposed swale appears to be encroaching on existing RPAs of trees - this is not acceptable and such conflicts should be designed out .

What is the white rectangle on the edge of a tree canopy ?

No landscaping whatsoever should take place within the RPAs of trees as this damages both the fine and larger structural roots. Even landscaping by hand causes physical root trauma.



I am concerned about “pinching” in some areas, mainly arising from car park expansion and identified by the consultees above. Trees on this site and its boundaries are significant contributors to visual amenity in this urban fringe location close to the Conservation Area and Special Landscape Area. Removal of trees has several negative impacts over and above visual effects including upon air quality and felling can give rise to archaeological concerns due to ground heave. You will be aware of Planning Policy Wales 12, Part 6 and advice relating to Green Infrastructure Statements (para 6.4.42 of PPW). I recommend one is provided with any future application. Acknowledgement and co-ordination on SUDS matters is also important in understanding how new features will link to the wider development. The Green Infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the ‘Step-Wise Approach’ has been applied.

Details of associated plant should also be required including for example, sprinkler buildings or pump houses and similar. Attenuation basins or drainage ditches/swales will need clear

detailing on plans and likely require sections. SUDS should not prejudice existing landscape features for example.

Impact upon biodiversity interests

Linking to the section above, the NCC Ecologist has advised as follows:

I have considered the Preliminary Ecological Appraisal (PEA) Report submitted with this pre-application, and I support the methodology and conclusions of that report.

The PEA identified that one building is a confirmed bat roost, and that a number of others have potential bat roost features. A number of bat emergence surveys are advised, depending upon the bat roost potential of the buildings affected. The trees on site were not considered likely to support roosting bats.

Emergence surveys can only take place between May and September inclusive, and ideally before the end of August.

Therefore any full application should be supported by a report on the results of these emergence surveys, setting out any avoidance, mitigation or compensation measures that may be required to ensure no detriment to the favourable conservation status of any bat species found to be present. If an EPS licence is required to allow the works to proceed, we should seek confirmation from NRW that they would be likely to issue such a licence.

The plans for the proposed development should include measures to enhance the site for biodiversity such that there is an overall biodiversity net gain. Please note that such measures are in addition to any which are needed to counteract any impact on roosting bats identified.

A Green Infrastructure Statement should also be submitted with a full application, to set out how any ecological mitigation and enhancement can be reconciled with landscaping and sustainable drainage.

Given the nature of the existing habitats on site, my only other concern would be impacts on nesting birds, which may use the buildings and trees affected. The Applicant should be reminded that nesting birds are protected under the Wildlife and Countryside Act 1981: Part 1, 1(1)(b), whereby it is an offence to intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built.

Caselaw makes it clear that, notwithstanding the licensing regime, the LPA must also address its mind to the three derogation tests when deciding whether to grant planning permission for a development which could harm an European Protected Species. A LPA failing to do so would be in breach of Regulation 3(4) of the 1994 Habitats Regulations which requires all public bodies to have regard to the requirements of the Habitats Directive in the exercise of their functions. You will need to provide sufficient information to enable the Local Planning Authority to consider and report on such tests if required.

Impact upon active travel, highway safety and parking

The Active Travel Officer has commented as follows:

There isn't a PROW that is directly impacted, however there is a PROW that runs near to the site. If any construction vehicles are in the area, my only stipulation would be that it is not impacted and that users can continue to use with safe access.

The Highways Officer confirms as follows:

Transport Statement

It's been confirmed that the development will not increase the number of pupils and staff attending the school however the sports facilities will be made available outside of school hours.

Parking

Existing - there are currently 90 spaces within the school, approximately 60 are accessed through the main gate and 30 through the secondary access located adjacent to the sports ground.

Proposed - A total of 65 car, 3 minibus and 7 motorcycle parking spaces will be accessed from the school's main entrance. The 65 car parking spaces include 8 accessible spaces for blue-badge holders and 13 EV charging spaces. Car sharing will be encouraged with 7 spaces (5%) to be prioritised for car-sharers. Also, 28 new cycle parking spaces will be provided. An additional 59 car parking space will be available from the school's secondary access.

The applicant has identified that 129 spaces will be required in accordance with the Newport City Council Parking Standards. Whilst the proposal will still result in a shortfall of 5 spaces the proposals offer a significant improvement to the existing situation.

Access

The proposal will utilise the existing main access off Cold Bath Road and the secondary access to the north of the site. Whilst the proposals will not increase the number of pupils and staff at the site, the proposed parking arrangement will increase the number of spaces being accessed through the secondary access point. The section of highway which links this access to Cold Bath Road is narrow, unlit and has no dedicated footway. This section of highway forms part of an active travel route, any increase in vehicle movements along this section of road will increase the likelihood of conflict between multi modal users and is therefore considered detrimental to highway safety.

It's noted that there is an existing public right of way (389/4/1) and active travel route (NP-CAE-P0020) which runs from the main access to the secondary access. This route does not benefit from a hard surface and therefore it would not be suitable in inclement weather. To address the concerns raised I would suggest that the PROW/active travel route is upgraded and hard paved so that the section of road subject to an increase in traffic can be circumnavigated by cyclist and pedestrians. The applicant will need to discuss this matter with the active travel team and public right of way officer.

Trip generation

I'm satisfied that the proposal will not adversely affect the capacity of the local highway network given that the number of pupils and staff will not be increasing.

Other matters

Should a full application be made the applicant will need to provide a detailed construction management plan to include the following:

- *Construction worker parking*
- *Compound - including provision for delivery vehicles to turn and therefore access and egress the highway in a forward gear.*
- *Delivery/construction vehicle management plan – to ensure that there is no conflict between construction traffic and vehicles associated with the drop and off and collection of children. This should include any other schools in the wider area.*
- *Wheel wash facilities*
- *Dust suppression measures*

As expected and previously noted, there are highways concerns (an objection) to the impact of development, notably the enlarged parking area off the secondary access, on highway safety grounds. There are also clear benefits associated with the reconfiguration on site and additional off road parking facilities to serve the school so that it more closely aligns with the adopted Parking SPG. Whilst the latter is a benefit, it does not in my view outweigh the concerns raised in relation to the use of the secondary access route. Therefore, this gives rise to harm and such harm must be avoided or mitigated.

The Highway Officer points to a potential option that may mitigate harm by removing other road users from the carriageway thereby reducing opportunity for conflict. This would be to adapt and upgrade an existing Active Travel Route. This route appears to show evidence of use on the ground but is informal and not surfaced. This limits its use in inclement weather. It offers a shorter route to the wider residential area north of the railway line and traverses the western boundary of the football field. The opportunity to upgrade this clearly exists and would appear to mitigate the Highway Officer's concerns in principle. However, this would need to form part of the proposals in my view and on the basis this land is owned by the Council we can expect at least a reasonable prospect of delivery and secure it via planning condition if permission is forthcoming. I would encourage early engagement with the Active Travel Officer, Leah Young, on this point.

Impact upon heritage considerations including archaeology

I have already cited the Principal Heritage Officer comments in a previous section of this report. Whilst not within the Conservation Area, the proposals will impact views into and out of it and this will be a material consideration. In archaeological terms, I note the information submitted in support of this enquiry and welcome it. The report indicates further reporting and monitoring may be necessary. It concludes:

Whilst no structures of Roman date were encountered during the course of the evaluation, it is possible that the proposed construction work will have an impact on the archaeological resource. The critical depth of the Roman deposit is 15.24m OD, and any ground intrusion works at this depth or deeper, will encounter this archaeologically significant deposit and require appropriate mitigation.

The Field Evaluation also identified significant asbestos deposits in the survey area. This will require additional information at application stage and bearing in mind that construction will involve excavation works and transport of materials off site. The NCC Environmental Health Officer has not responded to this enquiry and asbestos management is subject to separate regulatory controls. However, the application should be accompanied by additional information on this point such as appropriate testing to establish risk and associated methodology for management and remediation as necessary.

Flood risk, Air Quality and Residential amenity

The area proposed to be developed is not located within a flood risk zone based on the Flood maps for planning at time of writing.

The site is not located within an Air Quality Management Area but will require access via an AQMA. However, as you have confirmed the proposal does not increase school capacity, I have no concerns in this regard although note car parking capacity will be increased and this may attract additional vehicles to site in all likelihood. Any increased traffic outside school hours will likely be in off peak traffic periods when congestion can reasonably be expected to be significantly less. Efforts to encourage access by sustainable transport modes should be investigated and works to enhance existing Active Travel Routes close to the site that will afford more logical routes into school by visitors and students resident north of the railway bridge will be beneficial in my view and may reduce car traffic using the one way system to drop off for example. At present, there is no drop off facility for the school and no turning area at the school gates.

I note the Travel Plan submitted sets out aspirational targets for reduction in car usage to site and is a positive document in terms of its content. However, such documents rarely mitigate for harmful highway impacts should these be identified and are notoriously difficult to enforce. Therefore, whilst I welcome the aspiration and positive engagement with travel planning to encourage modal shift, there are highway concerns that will need to be mitigated as part of this scheme and these have been discussed in this response.

Dŵr Cymru Welsh Water is a statutory consultee in the planning process and we would encourage all developers to engage with Welsh Water as early as possible in order to address any issues that may arise during the planning/construction process. Dŵr Cymru operates a pre-planning advisory service in order to assess the impact of the proposed development on drainage interests and a written response will be provided. This service operates for a fee and can be submitted via an online enquiry form at <http://www.dwrcymru.com/en/Developer-Services>. Further information can be obtained from the dedicated team of planning officers at Dŵr Cymru on 0800 917 2652.

In May 2018, Schedule 3 of the Flood & Water Management Act will be implemented. Schedule 3 will require sustainable drainage (SuDs) on all new developments serving 2 properties or more and local authorities are to become a Sustainable Drainage Approving Body (SAB).

Schedule 3 of the Act requires surface water drainage for new developments to comply with mandatory National Standards for SuDs. It also requires surface water drainage systems to be approved by the SAB before construction work with drainage implications may begin. Provided National Standards are met, the SAB would be required to adopt and maintain the approved SuDs that service more than one property.

Your proposals will need to be accompanied by information detailing the sustainable drainage system to serve the development.

Conclusion

The development is acceptable in principle. It offers an opportunity to enhance an existing educational site for the benefit of all users and this is welcomed and is a significant merit of the scheme.

I have set out key issues, including some areas of concern or query, in the text above and trust that my assessment and the advice given by me and relevant consultees to the process are helpful in shaping the development. Where relevant, I have advised on information is consider necessary to accompany a future planning application. The fee for the application will most likely be based on gross floorspace of all new buildings. Planning fees in Wales are currently under review and will increase. At time of writing, the fee is £460 per 75sqm or part thereof.

While the Council will endeavour to keep pre-application enquiries confidential you should be aware that if for any reason any request for submitted information to remain confidential is subsequently found to be inadequate by the Information Commissioner, following any request under the Freedom of Information Act 2000, the Council will not be held responsible.

E-planning

We strongly encourage you to submit your applications to the planning department online via the 'Planning Portal' (www.planningportal.gov.uk). This will save money on printing costs and travelling/postage together with speed up the processing of your submission. You can attach drawings and supporting documents, including a professional quality site location plan; downloading the appropriate Ordnance Survey map and calculate the fees as part of submitting your application online.

Please contact me to discuss any of the above further.

Yours sincerely

Joanne Davidson

East Area Planning Manager, BSc(Hons), DipTP, MRTPI