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Caerleon Comprehensive School, Cold Bath Rd, Caerleon, Newport NP18 1NF

Heritage Impact Assessment

November 2025

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1. Introduction

- 1.1 This Heritage Impact Assessment (HIA) has been prepared to support the planning application for the development at Caerleon Comprehensive School, Cold Bath Road, Caerleon, Newport NP18 1NF. The proposals involve the demolition of several existing teaching and sports blocks (D1, D2, D3, G, H, K, and L), partial demolition and repurposing of the main school buildings (Blocks A/B/C), and the construction of new sports and teaching facilities.
- 1.2 The report has been prepared by KEW Planning, on behalf of Newport Norse, to assess the potential heritage impacts arising from the proposed works within this archaeologically sensitive area.
- 1.3 The purpose of the proposals is to deliver a modern, fit-for-purpose learning environment that better serves pupils and the local community by upgrading outdated facilities and improving sports, study, and social spaces.
- 1.4 The report is structured as follows and should be read alongside the full suite of planning documents, including the Design and

Access Statement, technical drawings, archaeological evaluations, and environmental surveys:

- Section 2: provides a description of the site and its heritage context.
- Section 3: details a summary of relevant planning policy and legislation.
- Section 4: sets out the planning history records.
- Section 5: outlines the objectives, Proposed Development & a Review of the historic development and archaeological significance of the site.
- Section 6: provides an assessment of heritage assets and their significance, including nearby scheduled ancient monuments and the Caerleon Archaeologically Sensitive Area.
- Section 7: contains the Heritage Conclusions.

2. Understanding the Site

Site Location

- 2.1 Caerleon Comprehensive School is situated on Cold Bath Road, at the southern edge of the historic town of Caerleon. The roughly rectangular site (circa 5.2 hectares) lies adjacent to Caerleon A.F.C. football pitch to the north, Caerleon Golf Course to the west and south, and important heritage sites to the northeast including the Roman Barracks and parts of the Roman Civil Settlement (refer to Figure 1). The school's western and northern boundaries are largely defined by mature trees and vegetation, while residential areas lie to the northeast and east.
- 2.2 The site lies immediately adjacent to the Caerleon Conservation Area, and therefore all works and new buildings are **outside** of the Conservation Area. The heritage test is therefore assessing the impact on the setting and not a direct loss of fabric within the Conservation Area.
- 2.3 It is within the nationally significant Caerleon Archaeologically Sensitive Area, recognised for its exceptional Roman heritage, including Isca Augusta, a major legionary fortress.

Heritage Designations

- 2.4 The school site and its surroundings are covered by several heritage designations of national importance, including:
- Caerleon Archaeologically Sensitive Area
 - Caerleon Conservation Area
 - Scheduled Ancient Monuments related to the Roman fortress and civilian settlement
 - River Usk Special Landscape Area
- 2.5 These designations reflect the rich archaeological and historic landscape that surrounds the site, necessitating careful consideration of any development proposals in order to preserve and respect this heritage.

Figure 1: Site Location



3. Planning Policy and Guidance

- 3.1 National and local planning documents have been taken into consideration as part of this proposal. This section summarises the policy framework that is relevant for the consideration of this planning application.

Historic Environment (Wales) Act 2023

- 3.2 The Historic Environment (Wales) Act 2023 provides the statutory framework for the protection and management of the Welsh historic environment. This includes listed buildings, conservation areas and scheduled ancient monuments, those sections that relate to the proposals include:

- Part 2, chapter 3 relates to the control of works affecting scheduled monuments
- Part 3, chapter 2 (90-91) relates to listed building consent.
- Part 4 (161- 163) relates to the control of demolition in conservation areas.

National Planning Policy - Planning Policy Wales (2024)

- 3.3 Paragraph 6.1.7 sets out the Welsh Government's objectives to *"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."

- 3.4 Paragraph 6.1.9 explains that *"Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place"*.

Technical Advice Note 24 'The Historic Environment' (TAN 24), 2017

- 3.5 Paragraph 1.7 defines a historic asset as *"an identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape"*.
- 3.6 Paragraph 1.15 explains that Heritage Impact Assessments are expected to be proportionate both to the significance of the historic asset and to the degree of change proposed and should include sufficient information to enable both the significance of the asset and the impact of change to be understood.

3.7 Paragraph 1.26 sets out that *“For any development within the setting of an historic asset, some of the factors to consider and weigh in the assessment include:*

- *The significance of the asset and the contribution the setting makes to that significance*
- *the prominence of the historic asset*
- *the expected lifespan of the proposed development*
- *the extent of tree cover and its likely longevity*
- *non-visual factors affecting the setting of the historic asset such as noise.”*

3.8 Paragraph 1.29 confirms that *“the local planning authority will need to make its own assessment of the impact within the setting of an historic asset, having considered the responses received from consultees as part of this process. A judgement must be made by the consenting authority, on a case-by-case basis, over whether a proposed development may be damaging to the setting of the historic asset, or may enhance or have a neutral impact on the setting by the removal of existing inappropriate development or land use”.*

Cadw Heritage Impact Assessment in Wales, 2017

3.9 Section 3 explains that *“the basic stages of heritage impact assessment, whatever the size and scope of the project, are should contain:*

1. *explain your objective and why changes are desirable or necessary*
2. *understanding the significance of your historic asset*
3. *identifying your proposed changes*
4. *assessing the impact of your proposals*
5. *setting out the reasoning behind your preferred option, including your design concepts and principles, in the light of the assessment process”*

3.10 Section 4.2 relates to understanding significance. It explains that in order to analyse an asset’s value, it is important to understand its heritage value which can be divided in:

- Evidential/archaeological interest – either known or the potential to yield.
- Historic interest – illustrating or associated with past lives or events.

- Architectural/artistic interest – the design and aesthetics of a place, either consciously or fortuitously created.
- Communal interest – how a place may be cherished by the people and communities who relate to them.

Setting of Historic Assets in Wales, 2017

3.11 This document highlights the definition of ‘setting’ set out in TAN24, adding that setting may include a range of factors:

- *“Functional and physical relationships with other structures/historic assets and how these have changed over time*
- *topographic features that influenced its location*
- *physical character of the surrounding landscape or townscape, including any formal design or land use*
- *the original layout of the historic asset and how this has changed*
- *potential buried or archaeological elements surrounding the historic asset*
- *views to, from and across the historic asset or place*
- *formal or planned vistas*
- *the prominence of the historic asset in views throughout the surrounding area*

- *views associated with the aesthetic, functional or ceremonial purpose of the asset; for example, defensive sites, beacons or designed landscapes*
- *historical, artistic, literary, place name, cultural or scenic associations might all contribute to the significance of a historic asset*
- *other sensory elements – noise or smell associated with the historic asset*
- *tranquillity, remoteness, ‘wildness’”.*

3.12 Section 4 explains that the assessment of the impact of a proposed change or development within the setting of historic assets should be carried out in four stages:

- *“Stage 1: Identify the historic assets that might be affected by a proposed change or development.*
- *Stage 2: Define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which the assets are understood, appreciated and experienced*
- *Stage 3: Evaluate the potential impact of a proposed change or development on that significance.*
- *Stage 4: If necessary, consider options to mitigate or improve the potential impact of a proposed change or development on that significance.”*

Conservation Principles for the Sustainable Management of the Historic Environment in Wales, 2011

3.13 This document informs “*Cadw’s approach to the protection and management of the historic environment as a whole*”. It sets out six conservation principles which should guide Cadw in the development and management of historic sites, and that should also be used by local authorities, property owners, developers and consultants in the decision making process:

- *“Historic assets will be managed to sustain their values.*
- *Understanding the significance of historic assets is vital.*
- *The historic environment is a shared resource.*
- *Everyone will be able to participate in sustaining the historic environment.*
- *Decisions about change must be reasonable, transparent and consistent.*
- *Documenting and learning from decisions is essential.”*

Local Planning Policy – Adopted Newport Local Development Plan (LDP), 2015

3.14 Relevant policies to this development proposal are:

- Policy SP9: Conservation of the Natural, Historic and Built Environment
- Policy GP6: Quality of Design

- Policy CE6: Archaeology
- Policy CE7: Conservation Areas

4. Planning History

4.1 Desktop research on the statutory planning register reveals eight planning application records for the site. The details of the planning application records of the site are set out in [Table 1](#) below.

Table 1 – Planning application records of the site

Reference	Description	Decision	Decision date
18/1123	Erection of weldmesh fence and gates up to 2.4 metres	Permitted	01/05/2019
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
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
09/1158	Erection of external canopies for outdoor play	Permitted	13/01/2010
08/0945	Siting of portacabin	Permitted	21/08/2008
04/1402	Provision of cabin stacked on top of existing cabin which is to be relocated	Permitted	15/10/2004
04/1031	Provision of additional cabin to be stacked on top of existing cabin for use by Gwent Music support	Withdrawn	11/08/2004
03/1286	Erection of a two storey teaching block and relocation of tennis courts and associated drainage works	Permitted	03/12/2003
99/0360	Erection of a single storey infill building to provide 4 classrooms and a display area	Permitted	25/05/1999
97/0635	Siting of a demountable classroom	Permitted	06/08/1997
95/0413	Proposed siting of a double demountable classroom unit	Permitted	02/06/1995
93/0445	Proposed siting of a double demountable classroom unit	Permitted	16/06/1993
91/0222	Erection of single demountable classroom	Permitted	23/04/1991

5. Objective & Proposed Development

- 5.1 The proposal seeks to modernise and consolidate educational and sports facilities at Caerleon Comprehensive School, through the demolition of several outdated teaching blocks and the construction of a new two-storey building. This new facility will enhance the school's ability to deliver high-quality education while also providing upgraded amenities for community use.
- 5.2 The proposals present an opportunity to improve the relationship between the retained elements of the original school and the modern but functionally obsolete buildings currently on site, enhancing both the appearance of the campus and its setting within the historic town of Caerleon. The development aims to deliver a more cohesive and contextually sensitive environment, reinforcing the value of the school as a key community asset.
- 5.3 The assessment considers the impact on the adjacent heritage assets, including the Caerleon Conservation Area, nearby Scheduled Ancient Monuments, and the wider historic landscape, as identified in Figure 2.

Caerleon Comprehensive School in Context

- 5.4 **Figure 2** identifies the application site boundary within the context of a number of designated heritage assets that may be affected by the proposal:
1. Caerleon Conservation Area
 2. Caerleon Archaeologically Sensitive Area
 3. Caerleon Civil Settlement
 4. Caerleon Legionary Fortress
 5. Caerleon Civil Settlement: Area Broadway Playing Fields
- 5.5 Other relevant heritage assets located in proximity to the site, but not considered to be adversely impacted due to their distance, topography, and the confined scale of the proposed development, include:
6. Caerleon Civil Settlement
 7. Caerleon Roman Amphitheatre
 8. Caerleon Civil Settlement
 9. Caerleon Civil Settlement
- 5.6 Several listed buildings are located along Caerleon's High Street. While their presence has been acknowledged and considered but have been discounted for the main body of the Heritage

Impact Assessment, as it is concluded that the proposed development will have no impact on their setting or significance.

Figure 2 – Nearby heritage assets



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



Caerleon Archaeologically Sensitive Area



Caerleon Conservation Area



Scheduled Ancient Monument

6. Analysis of Significance

Caerleon Conservation Area

6.1 The Caerleon Conservation Area, designated in 1970 and extended in 1977, encompasses a settlement of exceptional historic and archaeological importance, reflecting a rich and continuous history from Roman times through to the medieval and post-medieval periods. The Conservation Area includes the remains of the Roman fortress of Isca, a scheduled amphitheatre, and the site of a medieval castle, all of which contribute to its layered historic character.

6.2 The area's street pattern, including narrow and irregular medieval routes such as High Street and Mill Street, overlays earlier Roman infrastructure, with features such as Broadway reflecting the straight alignments typical of Roman planning. Beyond individual buildings and monuments, the Conservation Area's significance also derives from its open spaces, historic plot layouts, topography, and the consistent use of traditional materials.

Caerleon Archaeologically Sensitive Area

6.3 Caerleon is designated as an Archaeologically Sensitive Area because of its national and international importance as the site

of Isca Augusta, a major Roman legionary fortress. The area contains a wide range of buried and visible Roman remains, including the amphitheatre, bath complex, military barracks, roads, and the large civilian settlement known as the canabae. Archaeological investigations have revealed many well-preserved features beneath both modern buildings and open land, showing the site's exceptional potential. The density and quality of these remains, along with the variety of Roman structures, make Caerleon one of the most significant Roman military and civilian centres in Britain.

6.4 In addition to its Roman heritage, the area includes layers of medieval and later occupation, creating a deeply layered archaeological landscape. This designation highlights the importance of protecting the site's archaeological integrity, which continues to provide important discoveries and supports ongoing research into Roman and post-Roman Wales.

6.5 The Archaeologically Sensitive Area covers land including and surrounding Caerleon Comprehensive School, reflecting the close relationship between the school's grounds and this nationally important historic environment.

Caerleon Civil Settlement (Canabae Legionis) (3)

- 6.6 The Canabae Legionis, or civil settlement, lies to the south and west of the Roman fortress of Isca Augusta and formed the civilian extension of the military base. It developed along a Roman road leading from the west gate of the fortress to the quay on the River Usk, now followed by modern Broadway, and became the focus of substantial civilian occupation. The site is located adjacent to Caerleon Comprehensive School, with parts of the scheduled area extending around the school grounds.
- 6.7 Geophysical surveys and small scale excavations have revealed a dense network of Roman buildings and streets, including a monumental complex covering approximately five hectares.
- 6.8 As Cadw notes, *“The monument is of national importance for its potential to enhance our knowledge of Roman urban settlement organisation. It retains significant archaeological potential, with a strong probability of the presence of associated archaeological features and deposits.”*
- 6.9 The monumental complex, interpreted as a group of public or administrative buildings, includes one of the largest structures known from Roman Britain. Excavations confirmed it consisted of three distinct Roman buildings, likely disused by the early third

century AD. Additional structures of timber and stone were identified flanking the main road and side streets, while the Roman quay, excavated in the 1960s, survives beneath the present day golf course. Further remains extend into surrounding playing fields and open land, highlighting the scale and planning of Roman civilian life connected to the fortress.

Caerleon Legionary Fortress (Isca Augusta)

- 6.10 Caerleon Legionary Fortress, or Isca Augusta, is one of only three permanent Roman legionary fortresses in Britain. Founded around AD 75 during Governor Julius Frontinus’ campaigns against the Silures, it served as the base for the 2nd Augusta Legion. The fortress lies just east of Caerleon town centre and is located immediately south of Caerleon Comprehensive School, on rising ground beside the River Usk, chosen for access to sea routes and major Roman roads.
- 6.11 The site covers about 50 acres with four gated entrances, internal roads, and building blocks called insulae. Early timber defences were replaced by stone walls and towers in the 2nd century AD. As Cadw states, *“The monument is of national importance for its potential to enhance our knowledge of Roman military organisation... well preserved archaeological evidence concerning chronology, layout and building techniques.”*

6.12 Key features include the principia (headquarters), barracks housing centuries of soldiers, workshops with evidence of industrial ironworking, fortress baths dating to AD 75–77, officers' residences, granaries, and a military warehouse. The fortress remained active until around AD 300, with some later occupation.

6.13 The scheduled area includes the fortress remains and surrounding land likely to hold further archaeological evidence, providing valuable insight into Roman military life in Britain.

Caerleon Civil Settlement – Broadway Playing Fields

6.14 The area known today as Broadway Playing Fields lies to the west and southwest of the Roman fortress at Caerleon and formed part of the Canabae, the civilian settlement associated with Isca Augusta. This settlement developed along the Roman road running from the fortress's west gate to the River Usk quay, which is now the modern Broadway. Geophysical surveys and excavations have uncovered early timber buildings dating from the fortress's establishment, later replaced by stone structures as the settlement grew.

6.15 As Cadw states, *"The monument consists of the remains of a civil settlement, or canabae, of Roman date on the west side of Isca. The main focus for the settlement is the road leading from the west gate of the fortress to the quay on the River Usk, the modern Broadway."* Recent surveys confirm that significant archaeological remains survive beneath the modern playing fields.

6.16 Located immediately west of Caerleon Comprehensive School, the scheduled area includes the playing fields and surrounding land, where important archaeological features and deposits are likely to survive. This monument is of national importance for its potential to enhance understanding of Roman urban settlement organisation and its relationship with the military fortress.

6.17 The following tables provide an analysis of each of the heritage assets, together with the way in which the proposed development responds to that asset and the resultant level of impact upon the heritage asset (summarised in Table 2). The net heritage impact is considered to fall at the **neutral to low end of the spectrum of potential impact**, with no identified harm to the significance of designated assets found in the detailed assessment.

Table 2: Levels of significance Criteria

Significance Level	Description
Very High	Asset of exceptional importance. Usually nationally or internationally designated rare, with outstanding architectural, historic, evidential, or communal value. Change would require exceptional justification.
High	Asset of substantial importance. Contributes strongly to understanding the historic environment, townscape, or local identity. Includes well-preserved listed buildings or assets of regional/national interest. Sensitive to change; alterations could have notable impact.
Medium	Asset of moderate importance. Provides some understanding of heritage value or character; may retain certain original features or historical associations but less exceptional than High or Very High assets. Change may be acceptable if carefully managed.
Low	Asset of limited importance. Contributes minimally to heritage understanding or local character. May be of local interest only, with limited integrity or rarity. Change would have limited impact.
Neutral	Asset has no identifiable heritage value. Neither enhances nor detracts from the historic environment. Changes have minimal or no impact.
Detrimental	Asset detracts from heritage significance. May harm setting, character, or appreciation of nearby heritage assets. Alterations that remove or mitigate the negative features are generally considered beneficial.

The following assessments adopt the four-stage process in *Setting of Historic Assets in Wales* (Cadw, 2017), identifying relevant assets, analysing their settings, evaluating the impact of the proposals, and setting out mitigation where appropriate.

Table 3: Assessment of Caerleon Conservation Area

Assessment	Mitigations	Level of Impact on the Heritage Asset
The site is directly adjacent to the Caerleon Conservation Area (CCA). The existing multi-phase school complex presents a visually fragmented and utilitarian backdrop, which does not make a positive contribution to the character or appearance of the Conservation Area. Views of the proposed building may be visible (refer to Appendix 1) from the southern stretch of Cold Bath Road, the Caerleon AFC football pitch, and long-distance views from the Broadway. Additionally, the eastern elevation of the proposed building borders the CCA.	The proposal uses a rhythmic brick material palette sympathetic to local historic buildings (e.g. Former Caerleon College Campus). This improved coherence and simplified roofscape with better material quality mitigates any impact. The design respects the architectural rhythm and materials identified in the CCA Appraisal. The eastern elevation, facing the CCA, has been carefully designed with a corner window and matching brick to reflect historic context. Views are limited and vegetation offers partial screening.	The level of impact identified is considered as neutral to slightly positive The removal of untidy and piecemeal blocks presents a more coherent form, better material quality in the background of the Conservation Area. The proposal is designed to preserve the character of the CCA. Long-distance and limited seasonal views will not adversely impact the integrity of the Conservation Area. The visual context is respected through materials and design, and there is no harm to the area's setting.

Table 4: Assessment of Caerleon Legionary Fortress

Assessment	Mitigations	Level of Impact on the Heritage Asset
The site lies in close proximity to the Caerleon Legionary Fortress, a Scheduled Ancient Monument (SAM) of national archaeological and historical importance, representing one of the best-preserved Roman military sites in Britain. While the development site does not fall within the SAM boundary itself, the proximity means that potential indirect impacts, particularly during excavation and groundworks, must be carefully considered.	A series of precautionary and proactive mitigation measures are proposed to protect the archaeological integrity of the area during construction. These include a pre-commencement planning condition requiring the preparation and implementation of a Construction Environmental Management Plan (CEMP). The CEMP will stipulate that excavations in archaeologically sensitive areas be conducted under supervision, including the use of hand-digging techniques where required. In the event that archaeological features are uncovered during the construction phase, recording and documentation protocols will be immediately activated. This approach aligns with guidance under LDP Policy CE6 (Archaeology) and ensures an appropriate balance between development and heritage preservation.	The impact on the Caerleon Legionary Fortress is assessed as low. The development does not physically encroach upon the protected boundary of the monument and is confined to areas of previous disturbance where existing buildings have stood. The combination of archaeological evaluations, appropriate mitigation measures, and controlled excavation techniques will safeguard the asset's archaeological value. As such, while minor risks remain due to potential below-ground features, these are well-managed and unlikely to affect the significance or understanding of the monument.

Table 5: Assessment Caerleon Civil Settlement (Cumulative Impact)

Assessment	Mitigations	Level of Impact on the Heritage Asset
The site is also located adjacent to the Caerleon Civil Settlement, another Scheduled Ancient Monument that represents the extra-mural civilian area historically linked to the Roman fortress. The area is highly significant, forming a key part of the archaeological landscape of Caerleon and offering insights into Roman civilian life. Although no surface structures have been identified on the school site itself, earlier archaeological investigations (notably the 2012 field evaluation) revealed the presence of Roman and post-medieval deposits, which included high-status ceramics such as Samian ware and Caerleon flagon fragments. The location of the proposed demolition and construction activities near this SAM means that the development carries a potential risk of disturbing undocumented below-ground features, particularly during foundation and drainage works.	The planning submission proposes a comprehensive archaeological strategy to manage any risk to buried heritage assets associated with the Civil Settlement. This includes a detailed programme of archaeological monitoring and mitigation, as part of the CEMP, as well as pre-construction ground surveys to identify any anomalies. Additionally, much of the proposed development is located on areas previously occupied by school buildings, meaning that ground disturbance is likely to be limited to already impacted layers, reducing the risk of unearthing intact deposits.	The level of impact on the Caerleon Civil Settlement is assessed as low. While the area is archaeologically sensitive, the proposed works are contained within a site that has already undergone previous construction and disturbance. The risk of encountering significant remains is reduced, and where such risk exists, appropriate mitigation and recording procedures are in place. The setting and legibility of the Civil Settlement as a heritage asset will not be adversely affected, and its archaeological value will be safeguarded through the adopted procedures.

Table 6: Assessment of Caerleon Archaeologically Sensitive Area

Assessment	Mitigation Measures	Level of Impact on the Heritage Asset
The school site lies entirely within the Caerleon Archaeologically Sensitive Area, which reflects the nationally important archaeological landscape associated with the Roman legionary fortress of Isca Augusta and its surrounding civilian settlement. The area is known for significant buried Roman remains, including occupation layers, roads, buildings, and artefacts. The 2012 archaeological field evaluation identified a Roman occupation deposit containing ceramics such as Samian ware, Caerleon ware flagon fragments, and other Roman pottery dating from the mid-1st to 4th centuries AD. A post-medieval levelling layer was also recorded. No Roman structural remains were found, but the presence of in situ archaeological deposits confirms the site's sensitivity. The Roman layer lies at approximately 15.24m OD, and any works that disturb ground at or below this level risk impacting buried heritage assets.	A Construction Environmental Management Plan (CEMP) will be implemented to safeguard the archaeological resource. This will include pre-construction surveys where needed, archaeological monitoring during groundworks, and the use of hand-digging in sensitive areas. Should any features or finds be uncovered, appropriate recording and preservation procedures will be followed. Since much of the development will take place on previously disturbed ground, the risk to undisturbed archaeology is further reduced. This 2012 archaeological field evaluation will also support the application demonstrating how the site's below-ground heritage has been appropriately assessed and that any potential archaeological risk is understood and managed through informed mitigation measure	The level of impact on the Caerleon Archaeologically Sensitive Area is assessed as low. While the site is archaeologically sensitive, the proposed works avoid direct impact on known features. The implementation of mitigation measures will protect the archaeological significance of the area. The development is therefore expected to have a neutral to low impact.

7 Heritage Conclusion

- 7.1 This Heritage Impact Assessment has assessed the proposals for the redevelopment of Caerleon Comprehensive School in the context of the highly sensitive historic landscape of Caerleon.
- 7.2 The school occupies a prominent position within the Caerleon Archaeologically Sensitive Area and sits directly adjacent to the Caerleon Conservation Area, with several Scheduled Ancient Monuments located nearby, including elements of the Roman civilian settlement, the Roman legionary fortress, and the scheduled archaeological landscape associated with the Broadway Playing Fields. As such, any development on the site requires a proportionate and evidence-led understanding of potential impacts on both designated and non-designated heritage assets.
- 7.3 The schools character today is dominated by outdated school buildings, hardstanding and sports facilities which do not strongly contribute to the legibility of the historic landscape. However, the proposed redevelopment has been reviewed against these identified values.
- 7.4 The proposed design approach, involving the demolition of several outdated structures and the construction of a

consolidated two-storey teaching and sports building has been developed with sensitivity to massing, height, and layout. Although the new building will be modern in appearance, it is designed to integrate with the scale and form of existing school architecture and will sit largely within an already developed footprint. This reduces the potential for visual or physical impacts on the setting of surrounding heritage assets, including the Caerleon Conservation Area.

- 7.5 In terms of visual impact, the proposal is not anticipated to alter key views into or out of the Conservation Area. Existing vegetation, boundary treatments, topography and the intervening distance ensure that the school complex remains visually separate from the most sensitive historic focal points within Caerleon. Longer-distance views, including those towards the scheduled remains of the Roman fortress and civilian settlement, will not be adversely affected due to the limited height of the new building and the continued screening provided by mature landscape features.
- 7.6 Regarding archaeological impact, the analysis demonstrates that while the site is within an area of high archaeological

potential, much of the area has already been by new disturbed by existing development.

- 7.7 Where intrusive works cannot be avoided, they will be appropriately managed through archaeological mitigation agreed with the relevant authorities. This ensures that any surviving remains are either preserved in situ where feasible or recorded to professional standards. The development therefore adheres to the requirements of TAN 24, PPW and Cadw guidance concerning archaeological management.
- 7.8 The proposals represent an overall improvement to the character and coherence of the school site. The removal of outdated buildings and the introduction of a more unified and contemporary structure will rationalise the school site and create a clearer spatial and visual relationship between existing retained buildings. While the primary objective is to modernise school facilities, the replacement of visually cluttered and functionally obsolete buildings with a single, better composed structure is expected to have a **modest positive effect** on the quality of the school's backdrop to the Conservation Area
- 7.9 Although such improvements are not considered direct heritage benefits, they create a less visually cluttered backdrop to the Conservation Area and the wider historic landscape. The

development therefore is considered to sit comfortably within its context without competing with or diminishing the significance of nearby heritage assets.

- 7.10 When assessed in accordance with PPW (2024), TAN 24 and Cadw's Setting of Historic Assets guidance, the proposal is judged to result in **neutral to low levels of impact** on the identified heritage assets. No harm to the understanding, appreciation or significance of the Scheduled Ancient Monuments, the Caerleon Conservation Area, or the Caerleon Archaeologically Sensitive Area has been identified. Where minor impacts arise, they are effectively mitigated through design, layout, and archaeological measures embedded within the development strategy.
- 7.11 Overall, the assessment concludes that the proposed redevelopment of Caerleon Comprehensive School preserves the significance of the surrounding historic environment and is fully consistent with relevant national and local heritage policy. The scheme represents a high-quality and carefully considered approach to upgrading essential educational facilities within a sensitive archaeological landscape, without causing adverse effects on the historic character or archaeological resource of Caerleon.

Appendix 1: Views from the Conservation Area

View 1: Ariel view from the south.

View 2: Ariel view from the West.

View 3: View of existing school site from the southern stretch of Cold Bath Road, part of CCA.

View 4: View of the existing school site from the west corner of the public playing fields which border site.

View 5: View of the existing school site from the east side of the public playing fields.



Appendix 2: CADW Entry Listings

Caerleon Civil Settlement (ref: MM231)

The following provides a general description of the Scheduled Ancient Monument. The monument consists of the remains of a civil settlement, known as the Canabae, associated with and located on the W side of the Roman fortress of Isca. The extent of the civilian settlement is known as a result of geophysical survey and small scale excavation, and covers land to the S and W of the fortress, either side of the modern Broadway. The Broadway follows the line of a road of Roman date that led from the W gate of the fortress to the quay on the River Usk and was the main focus of civilian settlement. Geophysical survey in the fields around the amphitheatre revealed a complex of large public style buildings extending over an area of about 5 hectares. Work in the 1950s had indicated the presence of large roman buildings in this area, including a bath-house and a building with a monumental entranceway. The monumental complex revealed during the geophysical survey includes one of the largest buildings known from Roman Britain, as well as several other buildings reminiscent of roman 'public' military architecture. Small-scale excavation on the site confirmed that the monumental complex was Roman in date, probably going out of use in the early-3rd century AD, and that it consisted of three distinct structures.

The monumental complex has been interpreted as part of the official civilian settlement, the Canabae Legionis. Other structures associated with the Canabae have been located through geophysical survey on both sides of the Broadway, running back approximately 50m from the road. The survey also revealed several small roads running off Broadway, along which structures were identified. The structures appear to be multi-phased and constructed from both timber and stone. The site of the 3rd century AD quay was identified at the W end of Broadway and was excavated in the 1960s, it lies under the modern golf course. Further settlement structures have been identified on the NW side of the fortress, in an area of allotments and playing fields, these are also included in the scheduling. The monument is of national importance for its potential to enhance our knowledge of Roman urban settlement organisation. It retains significant archaeological potential, with a strong probability of the presence of associated archaeological features and deposits. The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive.

Caerleon Legionary Fortress (ref: MM230)

The following provides a general description of the Scheduled Ancient Monument. The monument comprises buried features and earthworks representing a Roman legionary fortress. The fortress at Caerleon, or Isca, is one of only three permanent legionary fortresses in Britain and was founded around AD75. Its construction was probably linked to the campaigns of the Governor of Britannia, Julius Frontinus, against the Silures. The fortress was home to the 2nd Augusta Legion, a legion of over 500 men. The site of the fortress was chosen for its position on gently rising ground adjacent to the river Usk at a point where it could be bridged but was also accessible to sea-going ships, and on the road between Wroxeter, Gloucester and Carmarthen. The fortress covered an area of 50 acres and conformed to the standard playing card design, had a gated entrance in the middle of each side and was divided into insulae, or blocks, by a network of roads. The fortress was in use by the 2nd Augusta Legion until around AD300 after which it continued to be partly occupied although there is no clear evidence to determine whether the occupation was military or civilian.

The earliest defences comprised a turf and clay bank surmounted by timber defences, timber towers forming gatehouses at each entrance, and single timber towers spaced at intervals around the fortress walls. A

large V-shaped ditch, 8m wide and 2.5m deep, ran around the outside of the defences. Excavation of a section of the fortress defences in Prys

Field revealed that oak logs had been laid on the ground as a foundation for the bank. Over these foundations the bank was constructed using turves cut to regulation size, and clay dug from the external ditch. The bank had a vertical outer face and was 5.5m wide and up to 3m high. A road, the via sagularis, ran around the inside of the rampart and allowed soldiers rapid access to the defences in case of attack. At the beginning of the 2nd century AD the timber defences were rebuilt in stone. The outside face of the bank was fronted with a stone wall 1.5m thick, the gates were fortified by twin towered stone gatehouses and a series of stone turrets replaced the individual timber towers.

The internal layout of the fortress conformed to the standard legionary fortress plan, with the via principalis running E/W through the fort, the via praetoria running N/S to intersect with it, and a network of other roads linking the different areas of the fortress. The earliest buildings are likely to have been timber-built, later replaced in stone. In the centre of the fortress, under the modern Church, was the Principa or headquarters, behind which was the Legate's residence. Either side of the Legate's residence were a series of workshops, one of which, a large courtyard building, has been subject to geophysical survey.

The results of the survey suggest that it was used for ironworking on an industrial scale. Barrack blocks were located both along the N side of the via principalis and inside the N defences. A section of the N barrack block complex was excavated in 1927/29 by Victor Nash Williams and is still exposed. The barrack blocks would have housed a legionary century (80 men), with 10 groups of eight men sharing two rooms. The smaller of the two rooms would have been used for storage and the larger room for sleeping. The centurion's residence, which included housing for junior officers and also offices, is located at the N end of each barrack block. A latrine block is located to the N of the barrack blocks, immediately inside the defensive bank. A series of ovens and cookhouses are located on the inside of the W rampart, separated from the barracks by the line of the via singularis. On the S side of the via principalis were the fortress baths. These were subject to a series of excavations between 1964 and 1981.

The baths were one of the first buildings to be constructed from stone, and date to AD75/77. They were an enormous complex, and included a large open air courtyard with a swimming pool and a huge range of buildings that contained the baths and an exercise hall. The outdoor swimming pool and a section of the cold baths, frigidarium, are on display in the fortress baths museum. On either side of the baths complex, fronting the via principalis, were houses for Tribune's, senior army officers. In the SW quadrant of the fortress the area behind the Tribune's houses was occupied by three granaries and a large courtyard

building that was used as a warehouse. Excavations carried out on the W range of the courtyard building revealed that it had been used for the storage of military equipment, with an exceptional collection of bronze and iron armour fragments found in one room.

On the E side of the baths complex a possible hospital was identified through excavation, while further barrack blocks were located inside the S defences, either side of the via preatoria. The monument is of national importance for its potential to enhance our knowledge of Roman military organisation. The monument forms an important element within the wider context of the Roman occupation of Wales and the structures may contain well preserved archaeological evidence concerning chronology, layout and building techniques. The scheduled areas comprises the remains described and areas around them within which related evidence may be expected to survive.