

Newport City Council

Eich cyfeirnod
Your reference

CONNEX/25/1030

By email

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Date

15 December 2025

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Dear Sir/Madam

Planning Application – Construction of a new sports and teaching facility including altered parking arrangements and associated landscaping, Caerleon Comprehensive School, Cold Bath Road, Caerleon, Newport

Thank you for your letter of 4 December inviting our comments on the information submitted for the above planning application.

Advice

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

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

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

AssessmentScheduled Monuments

MM011 Penrhos Camp (civil war earthworks)
MM014 Caerleon Castle Mound
MM021 St Julian's Wood Camp
MM023 Lodge Wood Camp
MM037 Medieval Tower at Hanbury Arms
MM049 Priory Wood Camp
MM087 Castle Mound E of Graig Wood
MM135 Candwr Camp
MM176 Great Bulmore Roman settlement
MM230 Caerleon Legionary Fortress
MM231 Caerleon Civil Settlement
MM232 Caerleon Roman Amphitheatre



MM233 Caerleon Legionary Fortress: Goldcroft Common
MM234 Caerleon Legionary Fortress: School Fields
MM235 Caerleon Legionary Fortress: Grounds of St Cadoc's Home
MM236 Caerleon Legionary Fortress: Area between Priory Hotel and Priory Lodge
MM237 Caerleon Legionary Fortress: Field SE of Broadway
MM238 Caerleon Legionary Fortress: Grounds of Museum
MM239 Caerleon Legionary Fortress: Back Garden of No 4 Museum Street
MM240 Caerleon Legionary Fortress: Area behind Caerleon House
MM241 Caerleon Legionary Fortress: Town Hall Park, High Street
MM242 Caerleon Legionary Fortress: Area of Myrtle Cottage Barracks
MM243 Caerleon Legionary Fortress: Area off White Hart Lane
MM244 Caerleon Civil Settlement: Site of Roman Building SE of Castle Street
MM245 Caerleon Legionary Fortress: Grounds of Health Clinic
MM246 Caerleon Legionary Fortress: Grounds of the Croft Nursing Home
MM247 Caerleon Legionary Fortress: Old Vicarage Garden
MM248 Caerleon Legionary Fortress: Former Garden of The Firs
MM252 Caerleon Legionary Fortress: Car Park and Garden of Endowed School, North of Broadway
MM253 Moated Site in Coldra Wood
MM254 Caerleon Civil Settlement: Area under Broadway Playing Fields
MM262 Caerleon Legionary Fortress: Former Ambulance Station Field

Registered Parks and Gardens

PGW(Gt)18(NPT) Beechwood Park
PGW(Gt)20(NPT) Bryn Glas
PGW(Gt)25(TOR) Llantarnam Abbey

This planning application is for a new sports and teaching facility at Caerleon Comprehensive School, Cold Bath Road, Caerleon.

The above designated historic assets are located inside 3km of the proposed development, with the boundaries of scheduled monuments MM230 Caerleon Legionary Fortress, MM231 Caerleon Civil Settlement and MM254 Caerleon Civil Settlement: Area under Broadway Playing Fields adjoining the application area.

Cadw were not consulted on the statutory pre-application consultation contrary to the requirements of Scheduled 4 lii of The Town and Country Planning Development Management Procedure Wales Amendment Order 2016. Unfortunately, this failure has led to the application being submitted with a Heritage Impact Assessment which does not follow the guidance given in the Welsh Government document "Heritage Impact Assessment in Wales", failing to consider the published Statement of Significance for the Roman fortress of *Isca* and the heritage values contained in it. The failure to consider the contents of the Statement of Significance has led to a flawed assessment of the effect of the proposed development on the settings of the scheduled monuments monument. Consequently, it is our opinion that the submitted Heritage Impact Assessment needs to be rewritten, ideally by a historic environment expert following the appropriate guidance, before the current application is determined positively.



Cadw are available to assist the applicant in the production of an appropriate assessment, by advising on appropriate locations from which the settings of the scheduled monuments can be considered and other documentation that is readily available and should be considered.

Yours sincerely,

Laura Cooper
Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol

Annex A

Our role

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

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

National Policy

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

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

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

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