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

Heritage Impact Assessment

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1. Introduction

- 1.1 This REVISED Heritage Impact Assessment (HIA) has been prepared to support a S73 application which seeks to amend the approved site layout. The water tank and pump house is proposed to be relocated further west, to the rear of Block A, while the sprinkler/hydrant tank is to be repositioned to the northeast of the site, adjacent to the boundary with the existing Caerleon Scouts Hut.
- 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 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:** set out the planning policy and guidance in relation to heritage considerations. .
 - **Section 3:** details a summary of the site and its surroundings.
 - **Section 4:** sets out the planning history records.

- **Section 5:** details the factors contributing to the setting of adjoining Heritage Assets in the form of a Setting Assessment.
- **Section 6:** provides an assessment of heritage assets and their significance, including nearby scheduled ancient monuments and the Caerleon Archaeologically Sensitive Area.
- **Section 7:** summarises Cadw's 2021 Statement of Significance in relation to Roman Caerleon.
- **Section 8:** contains the heritage conclusions and cumulative impacts.

2. Planning Policy and Guidance

- 2.1 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

- 2.2 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.

National Planning Policy - Planning Policy Wales (2024)

- 2.3 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."*
- 2.4 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."*

- 2.5 Paragraph 6.1.24 explains that *"Where nationally important archaeological remains and their settings 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 negative impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a demonstrably and unacceptably damaging effect upon its setting."*

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

- 2.6 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."*
- 2.7 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.

2.8 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.”*

2.9 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

2.10 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”*

2.11 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

2.12 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’”.*

2.13 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

2.14 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

2.15 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

3. Understanding the Site

Site Location

- 3.1 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 North-East 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 North-East and East.
- 3.2 The site lies immediately adjacent to the Caerleon Conservation Area, and therefore all works and new buildings are outside of the Conservation Area. 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

- 3.3 The school site and its surroundings are covered by several heritage designations of national importance, with a total of 31 assets being located within 3km of the site, those located directly adjacent to the site and relevant to this assessment include (as agreed with Cadw):
- MM230 Caerleon Legionary Fortress
 - MM231 Caerleon Civil Settlement
 - MM254 Caerleon Civil Settlement: Area under Broadway Playing Fields
- 3.4 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.
- 3.5 Figure 1 sets out heritage assets in proximity to the site and is not intended to include all assets in the area, only those limited to the scope of this HIA and those in the site's immediate context.

Figure 1: Caerleon Comprehensive School in proximity to adjacent Scheduled Ancient Monuments



1. MM231 - Caerleon Civil Settlement
2. MM230 - Caerleon Legionary Fortress
3. MM254 - Caerleon Civil Settlement: Area under Broadway Playing Fields
4. MM234 - Caerleon Legionary Fortress: School Fields
5. MM237 - Caerleon Legionary Fortress: Field SE of Broadway
6. MM232 - Caerleon Roman Amphitheatre

Figure 2: Caerleon Comprehensive School in proximity to Caerleon Conservation Area and Archaeological Sensitive Area (Newport proposals and Constraints Map)



Caerleon Archaeologically Sensitive Area



Caerleon Conservation Area

Caerleon Conservation Area

- 3.6 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.
- 3.7 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

- 3.8 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.

- 3.9 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.
- 3.10 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) MM231

- 3.11 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.

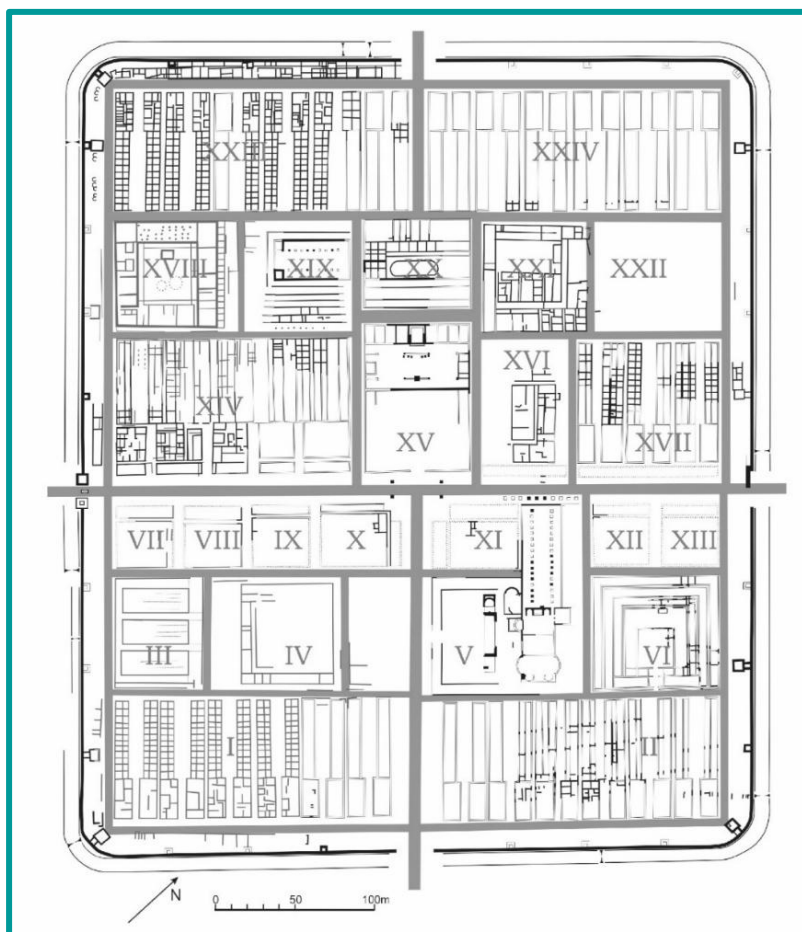
- 3.12 Geophysical surveys and small scale excavations have revealed a dense network of Roman buildings and streets, including a monumental complex covering approximately five hectares.
- 3.13 As Cadw notes, *“The monument is of national importance for its potential to enhance our knowledge of Roman urban settlement organisation. It retains significant archaeological potential, with a strong probability of the presence of associated archaeological features and deposits.”*
- 3.14 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) MM230

- 3.15 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 routes and major Roman roads.
- 3.16 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.”*
- 3.17 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.

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

Figure 3: Plan of Isca Fortress (GeoArch as cited by Cadw, 2021)



Caerleon Civil Settlement – Broadway Playing Fields MM254

- 3.19 The area known today as Broadway Playing Fields lies to the West and South-West 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.
- 3.20 As explained within the Scheduled Monuments- Full Report 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.
- 3.21 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.

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
25/1030	Construction of a new sports and teaching facility including altered parking arrangements and associated landscaping and infrastructure.	Permitted	04/03/2026
25/1033	Prior approval for demolition of buildings d1, d2, l g, h, a (partial), k and d3	Pending	n/a
25/0812	Prior notification of demolition of buildings d1, d2, l, g, h, a (partial) k and d3	Required	12/11/2025
25/0748	Placement of temporary sports hall	Permitted	30/10/2025
23/0985	Installation of 8 floodlight columns and associated bases/electrical works for 3g pitch	Permitted	21/12/2023
21/0483	Proposed location of shipping container for storage of sports equipment	Withdrawn	13/10/2021
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
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5. Factors contributing to the setting of adjoining Heritage Assets

Methodology

5.1 This Setting Statement has been prepared in accordance with Cadw's guidance Setting of Historic Assets in Wales (2017) and follows the principles set out within *Planning Policy Wales* and *Technical Advice Note 24: The Historic Environment*. The purpose of the assessment is to identify and evaluate the contribution that setting makes to identified historic assets and to establish how that setting is experienced and understood.

5.2 Cadw defines setting as the relationship of a historic asset to the surrounding landscape or townscape. In order to understand how the setting of adjoining assets contribute to their significance the setting of such assets has been considered against Cadw's factors of setting:

- 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'

Setting Assessment

- 5.3 The Caerleon Legionary Fortress and associated civil settlements form an integrated Roman military and civilian complex. The fortress functioned as the administrative, military and ceremonial centre of the Second Augustan Legion, while the surrounding civil settlements developed beyond its defences. Although later development has altered visible connections in the form of intercepting routes and above ground features such as sports pitches which conceal the known below ground spatial relationship between the fortress and civil settlements remains legible and continues to express their historic interconnections.
- 5.4 Roman Caerleon occupied a promontory between Lodge Hill and the Rivers Usk and Afon Lwyd, which bound the site on three sides. The fortress sits on a river terrace above the Usk, with its orientation shaped by the Roman road from Gloucester (Glevum) and the surrounding topography. An earlier legionary fortress at Usk, c.12 km upstream, was established in the 50s AD but was prone to flooding and subsequently abandoned. Caerleon replaced it at a drier, more strategic location near the West crossing point of the Usk, where a bridge carried the road linking Gloucester with forts at Cardiff. While the legionary garrison relocated, Usk continued in use as a smaller auxiliary fort with an associated civilian settlement.
- 5.5 The legionary fortress at Caerleon followed an imperial 'playing-card' plan, covering c.20.5 hectares. Its interior was carefully planned on an orthogonal street grid, with buildings arranged by function. Two main streets, the Via Praetoria and Via Principalis, linked the four gates to the central headquarters (principia). The stone defences comprised a wall with integral turrets, backed by an earthen rampart formed from material excavated from an external ditch, with the Via Sagularis running inside the rampart to allow movement around the perimeter.
- 5.6 The later history of Caerleon's fortress is uncertain. The Second Augustan Legion may have departed around AD 300 for Cardiff, although occupation continued into the fourth century. It remains unclear whether this involved a reduced military presence or civilian reuse of the fortress. By this time, several buildings were derelict or deliberately demolished; excavations at Priory Field show the main store was abandoned and demolished by c.350 yet continued to be occupied in a more informal manner. Poorly built structures and associated dating evidence suggest agricultural use within the fortress that persisted into the fifth century or later.
- 5.7 Today, the surrounding townscape and landscape character in the immediate vicinity of the identified assets reinforces and preserves the areas historic setting. The fortress area retains a

formal and enclosed character shaped by historic street patterns and archaeological remains as demonstrate by the Fosse and Broadway which to this day play a key part in the legibility of modern Caerleon.

- 5.8 Views between and across the assets contribute significantly to their setting. Within the fortress, views are relatively contained, reflecting its defensive and formal character. From surrounding civil settlement areas, particularly Broadway Playing Fields, views towards the fortress and towards the River Usk reinforce its historic dominance and central role within the landscape. Whilst the preserved openness of Broadway Fields could be seen to reflect past uses of this space thought to formerly comprise of a parade ground, with a main focus being a road leading from the W gate of the fortress to the quay on the River Usk, the modern Broadway.
- 5.9 The fortress retains prominence within Caerleon due to its elevated position and central location. Although modern development limits long-distance views, it continues to act as a focal point within the townscape. The civil settlements are less visually prominent but gain significance through their proximity and relationship to the fortress. Excavated area of the fortress play a prominent role in the understanding of the area's rich roman history for visitors whilst the retained openness of the civil

settlements contributes to the prominence of such assets in an otherwise urbanised environment .

- 5.10 Published Scheduled Ancient Monument Full Reports in relation to the assets identify significant archaeological potential including a strong probability of the presence of associated archaeological deposits expected to survive below ground, whilst more recent geophysical surveys of the area under Broadway Playing fields have revealed that substantial remains still survive.
- 5.11 The assets have a direct connection with an historical Roman presence in Wales, particularly by the Second Augustan Legion, and play a significant role in defining Caerleon as a nationally important Roman settlement. Their significance is further reflected in ongoing archaeological investigation, public interpretation, historical understanding/research and visitor experience all of which contribute the character and experience of Caerleon's setting and setting.

Figure 4: Caerleon Legionary Fortress (Isca Augusta) MM230
(Cadw, 2025)



6. Analysis of Significance

Methodology

- 6.1 This section provides an assessment of the heritage significance of identified scheduled ancient monuments and heritage assets including the proposals impact upon them.
- 6.2 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 includes 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.
- 6.3 PPW goes on to set out that:
- “Where nationally important archaeological remains and their settings 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 negative impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a demonstrably and unacceptably damaging effect upon its setting...Where archaeological remains are known to exist or there is a potential for them to survive, an*

application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.”

- 6.4 In accordance with Technical Advice Note (TAN) 24: The Historic Environment and Cadw’s Heritage Impact Assessment guidance, applicants are required to identify and describe the significance of any historic asset that may be affected by a proposal, including the contribution made by its setting. This provides the baseline against which the impact of the proposed development can be assessed.
- 6.5 As such, the methodology used in this assessment of significance derives CADW Heritage Values (Heritage Impact Assessment in Wales, 2017) whereby inter-related heritage values may be attached to a place.

CADW Heritage Values (Heritage Impact Assessment in Wales, 2017)

Evidential value - the extent to which the physical fabric tells how and when your historic asset was made, how it was used and

how it has changed over time. There may be buried or obscured elements associated with your historic asset which may also be an important potential source of evidence.

Historical value - the way in which an historic asset may illustrate a particular past way of life or be associated with a specific person or event; there may be physical evidence for these connections which it could be important to retain.

Aesthetic value - the design, construction and craftsmanship of an historic asset. This can also include setting and views to and from the historic asset, which may have changed through time.

Communal value - an historic assets particular significance to people for its commemorative, symbolic or spiritual value, or for the part it has played in local cultural or public life. This will be particularly important in the case of buildings in public use or sites where public access must be maintained or improved

6.6 The assessment of significance of adjacent heritage assets has been based off a scale of significance that derives from national policy/guidance and best practise, as shown in Table 2.

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.

Caerleon Legionary Fortress (Isca Augusta) MM230 Significance

Evidential Value

- 6.7 Caerleon Legionary Fortress preserves extensive buried archaeological remains and earthworks relating to a Roman legionary fortress. The remains are one of only three permanent legionary fortresses in Britain, the site has a rare capacity to inform understanding of Roman military organisation, planning and daily life. The survival of defensive banks, ditches, roads and building foundations allows detailed study of fortress layout, construction techniques and development over time.
- 6.8 Excavations undertaken at Prysge Field, in the North-Western corner of the fortress between 1927 and 1929, exposed the remains of eight barrack blocks, representing one of the very few systematically excavated examples of legionary accommodation from across the Roman Empire. These investigations also revealed a series of long, narrow structures set against the earthen rampart of the fortress's North-West wall, interpreted as armamentaria associated with the manufacture and repair of weapons and armour for the legion.
- 6.9 Excavations of the defences also revealed oak log foundations, rampart and stone walling, providing evidence for Roman building practices. Areas of the fortress remain unexcavated

within the scheduled area, meaning the site retains considerable potential to yield further archaeological, environmental and chronological evidence. As such the monument is considered to hold a *very high evidential value*.

Historical value

- 6.10 The Isca legionary fortress at Caerleon has *very high historical value* as one of only three permanent Roman legionary fortresses in Britain, founded around AD 75 during the Roman conquest of Wales. Associated with the Second Augustan Legion, it illustrates the scale, organisation and permanence of Roman military occupation and control. Its strategic riverside location and standardised layout reflect Roman military planning, while its long period of use, continuing beyond AD 300, demonstrates the endurance and later transformation of Roman military sites. The well-preserved buried remains and earthworks make Isca a nationally important resource for understanding Roman military organisation and the Roman occupation of Wales.

Aesthetic Value

- 6.11 The aesthetic value of the monument lies primarily in the physical survival of earthworks, exposed archaeological remains and the overall legibility of the fortress. Although much of the monument is buried, visible features such as the ramparts and

the exposed barrack blocks alongside remains displayed within the Roman Baths Museum help convey the scale of the fortress. The monument's setting on gently rising ground beside the River Usk to its visual presence and reinforces locational understanding. Overall, the monument is considered to have a *high aesthetic value*.

Communal Value

- 6.12 The monument has a *very high communal value* as an important focus for education, research and public engagement. It plays a central role in the historic character and identity of Caerleon and is a key element of the Roman heritage of Wales. The accessible remains and associated museum displays support learning and interpretation for a wide audience, from local communities to visitors from further afield. g

Overall Significance

- 6.13 Taken together, the evidential, historical, aesthetic and communal values demonstrate that Caerleon Legionary Fortress is of *very high heritage significance*. The Roman legionary fortress at Caerleon is of international importance for the insight it provides into Roman military organisation, construction and occupation of Caerleon. The scheduled area, including both known archaeological remains and surrounds include the

potential to contain related archaeological remains and it is therefore fundamental to safeguard this significance to enable future research and continued interpretation.

- 6.14 As noted by Cadw, Isca is widely recognised as one of the best understood legionary fortresses in the Roman Empire, comparable with other sites of international importance such as Noviomagus, Vetera, Novaesium, Vindonissa, Carnuntum, Lambaesis and Betthorus. Over a century of archaeological investigation at Caerleon has produced an exceptional depth of knowledge about the fortress, its development and its garrison, establishing Isca as a key reference, or 'type-site,' for the study of Roman legionary fortresses.

Caerleon Civil Settlement – Broadway Playing Fields MM254

Evidential Value

- 6.15 The evidential value of the Caerleon Civil Settlement at Broadway Playing Fields lies in the survival of extensive buried remains of the Roman canabae, identified through geophysical survey and excavation. Archaeological investigation has revealed early timber buildings later replaced in stone, as well as the clearance and resurfacing of an area closest to the fortress in the late 1st or early 2nd century AD, thought to represent a parade ground.

6.16 Evidenced by recent geophysical surveys the survival of substantial archaeological deposits beneath the modern playing fields gives the monument strong potential to enhance understanding of Roman urban settlement organisation and its relationship with the adjacent legionary fortress.

6.17 The monument is nationally important for the contribution it can make to understanding the organisation of Roman urban settlements. It preserves an important level of archaeological potential, with a strong likelihood that related features and deposits survive beneath the ground. demonstrating a *very high evidential value*.

Historical value

6.18 The monuments historic value stems from its survival as the Roman canabae associated with the legionary fortress of Isca. The monument preserves evidence for the location, extent and development of the civilian settlement on the West side of the fortress, focused along the road between the West gate and the River Usk quay.

6.19 Archaeological evidence of early timber buildings later replaced in stone records successive phases of Roman occupation, while the clearance and metalling of part of the settlement in the late

1st or early 2nd century AD reflects a documented change in use of land adjacent to the fortress. The surviving remains beneath the modern playing fields form an important historic record of Roman civilian settlement contemporary with the fortress at Caerleon.

6.20 Evidence from survey and investigation indicates that archaeological remains are likely to be well preserved, and the site has strong group value as part of the wider Roman landscape of Caerleon, with clear potential to inform understanding of Roman civilian life and its relationship with the fortress. As such it can be said that the area under Broadway Playing Fields has a *very high historical value*.

Aesthetic Value

6.21 Although the Roman canabae survives almost entirely as buried remains, the openness of the playing fields reflects the historic extent of the settlement and preserves the visual coherence of the area between the fortress and the River Usk. The lack of intrusive development allows the historic route of the Roman road (the modern Broadway) and the spatial connection between the fortress, civilian settlement and river frontage to remain legible within the landscape, contributing to the setting of the Scheduled Monument and the wider Roman complex at

Caerleon attracting a *medium - high aesthetic value*. The aesthetic value of the site is reduced through the presence of parking/traffic along Broadway and the dated appearance of school existing school buildings on the monuments Northern boundary which are a contrast to the modern additions at Caerleon Rugby Club to the South of the monument.

Communal Value

- 6.22 Despite the buried and subsequent invisible nature, the asset is considered to have a *very high communal value* as part of the wider Roman landscape of Caerleon, including nearby scheduled ancient monuments and as such, contributes significantly to public understanding of Roman life beyond the military context. The use of the site as a Roman parade ground is notable given its existing community use as playing fields for community gathering and spectatorship which creates a clear visual and functional parallel with its earlier use as a Roman parade ground.

Overall Significance

- 6.23 The monument is of national significance due to its capacity to contribute substantially to understanding the organisation and character of Roman urban settlement. It preserves a high level of archaeological potential, with geophysical surveys suggesting

a strong likelihood of archaeological features and deposits being located within the site. As a result, the asset is considered to have a *very high significance*.

Caerleon Civil Settlement (Canabae Legionis) MM231

Evidential Value

- 6.24 The monument has *very high evidential value*. Past investigations have defined the extent of the Canabae, revealing roads, a quay, and a range of multi-phased timber and stone structures. The identification of a large, monumental complex of Roman date, consisting of three distinct structures likely going out of use in the early-3rd century AD.
- 6.25 Archaeological works in the 1950's identified the presence of large roman buildings in this area, including a bath-house and a building with a monumental entranceway. As noted by the Scheduled Ancient Monument Report *"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."*
- 6.26 Other buildings linked to the Canabae have been identified through geophysical survey on both sides of the Broadway, extending for approximately 50m away from the road. The survey

also recorded a number of smaller roads branching off the Broadway, along which further structures were detected.

- 6.27 Together, these remains retain significant archaeological potential to yield further evidence for Roman urban settlement organisation and activity associated with the fortress of Isca.

Historical value

- 6.28 The value of the monument lies in its clear association with the Roman fortress of Isca and its role as the civilian settlement (canabae) that developed alongside it. The remains demonstrate how the settlement was focused along a Roman road linking the fortress to the quay on the River Usk. The presence of large public-style buildings, including a monumental complex interpreted as part of the official canabae legionis, reflects the importance and status of the settlement within the Roman landscape. Evidence for multi-phased buildings, roads and a 3rd-century AD quay shows the development, use and decline of the settlement over time, contributing to understanding of Roman urban settlement organisation in Britain. As such the monument attracts a *very high historical value*.

Aesthetic Value

- 6.29 The *aesthetic value is medium*, as the remains survive almost entirely below ground and are not visually legible within the modern landscape.

- 6.30 The significance of the monument lies primarily in buried archaeological remains rather than visible above-ground features. However, the open character of the land, particularly along the line of the Broadway and around the amphitheatre, allows the historic layout of the Roman settlement to be appreciated in the landscape. The survival of the monument's alignment within the fortress and barracks provides a subtle visual and spatial connection to the Roman past, contributing modestly to the monument's aesthetic value through its legibility and setting rather than through physical remains.

Communal Value

- 6.31 The monument has a *high communal value* through its association with the well-known Roman heritage of Caerleon, which is central to local identity, education and tourism. As part of a wider scheduled Roman landscape that includes the fortress, baths and amphitheatre, the site contributes to public understanding and appreciation of the area's Roman past, even though it is not directly visible.

- 6.32

Overall Significance

- 6.33 Caerleon Civil Settlement (Canabae Legionis) MM231 is of *very high national significance* due to its strong evidential and historical value as a Roman civilian settlement associated with the legionary fortress of Isca Augusta. The site contains well-preserved buried remains with clear potential to enhance understanding of Roman civilian life and military-civilian relationships, and its importance is reinforced by its strong group value within the wider Roman landscape of Caerleon.

7. Cadw Statement of Significance (2021)

Cumulative Significance of Roman Caerleon

7.1 Having considered the individual significance of adjacent Scheduled Ancient Monuments this statement now considers the group Significance of Roman Caerleon as directly quoted from Cadw's own Statement of Significance for the town which groups the Assets into five main categories:

- CAERLEON LEGIONARY FORTRESS (Reference Numbers: MM230; MM233; MM234; MM235; MM236; MM237; MM238; MM239; MM240; MM241; MM242; MM243; MM245; MM246; MM247; MM248; MM252; MM262)
- CAERLEON AMPHITHEATRE (Reference Number: MM232).
- CAERLEON CIVIL SETTLEMENT (Reference Numbers: MM231; MM254; MM244)
- Caerleon Conservation Area
- *Caerleon Archaeologically Sensitive Area*

7.2 The Statement finds that Caerleon is one of the most important sites in Britain and Europe for understanding the Roman conquest, colonisation and occupation of native populations,

evidenced by exceptionally complete and well-preserved archaeological remains. Of *international significance*, it represents a very rare example within the Roman Empire of a permanent legionary fortress where archaeological evidence survives to a high degree and remains accessible for ongoing investigation and interpretation.

Evidential Value

7.3 Caerleon is a site of international significance. The town is a very rare example from anywhere in the Roman Empire of a permanent legionary fortress where the archaeological remains are so well preserved and accessible for further exploration.

7.4 Caerleon's archaeological remains of its Roman past are exceptional in Britain. The evidence consists of excavated buildings and monuments, the finds and archives generated by previous excavations in the fortress and its adjoining civilian settlements, as well as the extensive and unexplored remains elsewhere in Caerleon. Together, these historic assets are the only sources with which to tell the 300-year Roman history of the fortress, its legionary garrison, as well as the people that lived outside its walls and in the surrounding countryside.

7.5 The consolidated remains of the Amphitheatre, Prysg Field barracks and the Fortress Baths are unrivalled in Europe. These

monuments (owned by the Welsh Government managed by Cadw) greatly enhance the visitor experience, encouraging people to engage with different types of archaeological evidence and alternative aspects of life in Roman Caerleon.

- 7.6 The collections housed in the National Roman Legion Museum are of international importance and their continued study underpins Caerleon's reputation as a centre of research and innovative public engagement. The NRLM's gallery and education facilities continue to be popular with visitors and the Museum currently operates at near-capacity in terms of visitor numbers, particularly school groups.
- 7.7 Damage to the archaeological resource is mitigated by NCC's and Cadw's careful management of the remaining open areas in and around Caerleon. The land to the South-West of the Amphitheatre, however, is currently privately-owned and is being actively degraded by the use of heavy farm machinery, particularly in wet conditions.
- 7.8 Changing weather patterns are expected to increase rainfall in the UK by up to 30% during the winter months by the middle of this century. Unless mitigated, this will saturate the ground and consequently affect the condition of the buried archaeological remains, while increasing the likelihood of flooding in Caerleon and the demands for flood prevention schemes that could have

negative impacts on the town's heritage assets. Erosion caused by increased flows of water in the Usk is also likely to become more of a problem in the future.

Historical Value

- 7.9 Caerleon is one of a handful of sites in the UK where people can learn about and understand the impact of the Roman Empire on the native peoples and cultures in Britain. The conquest, pacification and colonisation of Britons by the Mediterranean superpower of the ancient world helps explain who we (and others) are today and can also provide a challenging perspective on important relevant topics, such as the study of imperialism and globalisation.
- 7.10 The archaeological remains at Caerleon – monuments and artefacts – inform and inspire thousands of people each year. Learning about the ancient past improves the appreciation of the shared but diverse histories of the places we live in and creates a stronger sense of belonging and social resilience.
- 7.11 Caerleon has a long tradition of encouraging and disseminating evidence-based knowledge and understanding about Roman Britain to a wide variety of audiences. Maintaining public engagement initiatives will be critical to Caerleon's continued significance in the future, requiring innovative approaches to

engaging the public and the continued preservation and conservation of the town's unique heritage assets.

- 7.12 Caerleon has great potential to proactively engage with audiences of all types, whether young or old, local or visiting from afar, informed or unacquainted with archaeology and the past. Collaborating with on-going research, for example by volunteering in the NRLM or taking part on research excavations, improves the public's knowledge and understanding of Roman archaeology and history, enhancing the communal sense of belonging.
- 7.13 Ensuring that all of the sites and monuments in Caerleon are provided with consistently high-quality interpretation is necessary if people are to continue to have a positive experience during their visits to the town.
- 7.14 The 2017 Thurley Review of AC/NMW notes that 'interpretation provided by Cadw in the amphitheatre and fortress [Prysg Field] is limited and badly maintained' and also that the collections housed in the National Roman Legion Museum are 'urgently in need of re-display'. Refreshing the displays at Caerleon's monuments and sites would create a more coherent and consistently excellent visitor experience throughout the town.

- 7.15 Exploring the possibility of extending the UNESCO 'Frontiers of the Roman Empire' World Heritage Site to incorporate the short-lived but unique Roman Frontier in Wales, focused on the fortress of *Isca* at Caerleon, would bring significant cultural, social and economic benefits to Caerleon, the Newport area and Wales generally.

Aesthetic Value

- 7.16 The layout and architecture of Caerleon's historic centre are directly and indirectly influenced by the town's Roman past. The High Street essentially follows the course of the *Via Praetoria* that led from the main gate of the fortress to its central headquarters building, while Museum Street and the Broadway follow the *Via Principalis* that crossed the fortress. The classical façade of the NRLM is a daily reminder of the Roman legacy in Caerleon, as is the mosaic on the wall of the Town Hall depicting a legionary and a mother with her child. Wooden sculptures dotted around the town (commissioned from artists attending the annual Caerleon Arts Festival), create a unique sense of Caerleon's historic significance, distinctively expressed with some charm in the Ffwrwm Art and Crafts Centre on the High Street.
- 7.17 Caerleon's iconic Amphitheatre is enjoyed by hundreds of thousands of visitors each year. Most commonly associated with

bloodthirsty gladiatorial combat so well known in the public imagination, it symbolises the conquest of Britain by the Romans and the imposition of a new society and culture on the native tribes. Its semi-rural aspect on the edge of Caerleon provides a sense of mystery and other-worldliness, while the views from Amphitheatre Field Southwards across the Usk's floodplain towards Newport are largely unspoilt by modern development and greatly appreciated locally (and could easily be improved).

- 7.18 Residents and visitors regularly cite the volume of traffic passing through the town as a serious problem (especially during rush hours when traffic is often at a standstill). Coaches bringing schoolchildren and other groups have to navigate Caerleon's narrow roads, while the main coach and carpark on the Broadway impairs the setting of the Amphitheatre, particularly on busy weekends when it can become full very quickly.
- 7.19 The statutory protection of much of the area within and immediately outside Caerleon has resulted in the construction of new housing away from the historic town, most notably on Lodge Hill and along the Ponthir Road. An increase in the number of people living in and around Caerleon inevitably adds to the considerable pressure on the town's already stretched infrastructure, exacerbating problems with issues such as traffic flow. The need for additional housing to provide for a growing

population in the Newport area is likely to increase pressure on the existing areas of greenbelt and green wedge around Caerleon.

- 7.20 Destination satisfaction and perception are critical in maintaining Caerleon's popularity as a place to visit, and vandalism and other anti-social behaviour at the open-air monuments, particularly the Amphitheatre, are longstanding problems that need to be resolved.

Communal Value

- 7.21 Caerleon's reputation as a popular place to live and a major tourist destination is founded on a century of ground-breaking archaeological work combined with the effective protection of its many heritage assets. These ensure the continued appeal of Caerleon as a place where the public can find out about the Roman past in Wales and Britain.
- 7.22 Cultural events such as the Military Spectaculars and performances of Shakespeare plays in the Amphitheatre, or the Caerleon Arts Festival, reinforce the importance of Caerleon's monuments to the local and regional communities, adding to the town's special reputation.

- 7.23 A greater awareness of Caerleon's rich history encourages positive associations with local and national identities, while enhancing civic pride and community cohesion.
- 7.24 The continued prosperity of Caerleon and South Wales more generally, depends on maintaining the popularity of the town as a place to live in as well as to visit. A successful historical site delivers many thousands of visitors who spend time and money there supporting local businesses, creating employment opportunities and increasing economic resilience at local and regional levels.
- 7.25 Employment opportunities in turn generate local openings for people to acquire new skills and competencies, with knock-on benefits for improved social wellbeing.
- 7.26 New archaeological research will reinforce Caerleon's international standing as a 'type-site' for the study of legionary fortresses and the Roman army, as well as its appeal as a tourist destination. This could build on the recent excavations in Priory Field or in the Southern Canabae between the Amphitheatre and the Usk. If designed as 'community engagement' projects, further research would also provide new opportunities for local people to become directly involved in this work, improving knowledge, understanding and skills, as well as community cohesion and wellbeing. Such opportunities are becoming

increasingly rare and there are many benefits of visiting or working on an excavation or with archaeological artefacts, particularly for children and young people.

Summary

- 7.27 Caerleon stands among the most significant sites in Britain and Europe for examining the Roman Empire's conquest and long-term occupation of indigenous communities, supported by an exceptional survival of archaeological evidence. Internationally important, it is a rare example of a permanent legionary fortress where remains are both extensively preserved and readily accessible for ongoing research. The surviving amphitheatre, Prysog Field barracks and fortress baths are without parallel in Europe, and together with a rich body of monuments and artefacts, they continue to engage and educate large numbers of visitors. The site's reputation as a popular heritage and tourism destination has been built on more than a century of influential archaeological investigation and sustained conservation of its historic assets.

8. Heritage Impact

Summary of proposals

- 8.1 The proposed amendments introduce a number of changes to the approved site layout. The sprinkler tank is proposed to be relocated to the west of the site, to the rear of Block A, while the hydrant tank is to be repositioned to the north-east, adjacent to the boundary with the existing Caerleon Scouts Hut.

Objective of the proposals

- 8.2 The objective of the proposed amendments is to facilitate the relocation of the approved sprinkler and hydrant tanks in response to detailed design development and fire safety requirements associated with the consented scheme.
- 8.3 The proposals seek to ensure that the necessary fire-fighting infrastructure can be accommodated within the site whilst maintaining the operational requirements of the approved development.
- 8.4 To accommodate the revised tank locations, minor amendments are proposed to the approved parking layout whilst maintaining adequate parking provision across the site.
- 8.5 The proposals also seek to provide boundary treatments that are consistent with the approved design approach, avoid impacts on existing Root Protection Areas, and limit changes to the

approved landscape strategy in order to maintain ecological connectivity.

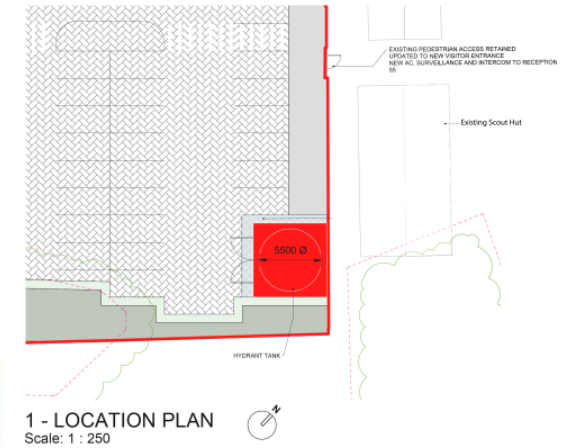
Figure 5: Proposed elevations



WEST ELEVATION
Scale: 1 : 100



NORTH ELEVATION
Scale: 1 : 100



SOUTH ELEVATION
Scale: 1 : 100



EAST ELEVATION
Scale: 1 : 100

Figure 6: Views from *MM230 Caerleon Legionary Fortress*
towards development site – outline of hydrant tank shown in red.



Impact of proposed changes on significance and setting

- 8.6 Having undertaken an assessment of significance of identified heritage assets, this section now seeks to assess the proposals impact upon the significance of those assets including any avoidance or mitigation measures being proposed.
- 8.7 To understand the impact upon significance the following measured criteria has been devised using the range of impacts set out within Cadw's guidance document 'Heritage Impact Assessment in Wales' as a guide:
- **positive** – such as the repair of damage, the removal of intrusive elements or bringing a building back into beneficial use so that it is no longer at risk
 - **neutral** – such as where proposals are sympathetically designed, or change is accommodated in part of the building or site that is less sensitive
 - **negative** – such as when important fabric or significant aspects of the original design are removed or altered. If the decision maker deems that the level of damage is unacceptable and there are few compensatory benefits, the application may be refused.

MM230 Caerleon Legionary Fortress

- 8.8 The site lies in close proximity to the Caerleon Legionary Fortress (MM230), a Scheduled Ancient Monument (SAM) of **very high**

significance, representing one of the best-preserved Roman military sites in Britain. The development site does not fall within the monuments boundary nor are any physical works to the monument proposed; the proximity means that potential indirect impacts upon the setting of the monument could arise. Having considered heritage values of the asset, the proposals impact upon the significance of Caerleon Legionary Fortress is likely to be limited to visual impacts only.

- 8.9 Views out of the monument and towards the school are currently obscured by the presence of an existing building to the North-East of the site, currently occupied by Caerleon Scout Group. The proposal does not seek to alter this relationship with the aforementioned building remaining outside of the site's boundary and in place.
- 8.10 The proposed hydrant tank is located directly to the rear of the aforementioned Scout Hut with the access ladder being largely consistent with roof line of the existing Scouts Hut. As such, it is clear that the proposed hydrant tank could be partly visible when viewed from the MM230 but this would be extremely minimal and isolated to the very top of the access ladder. That said, the visual relationship between the location of the tank and MM230 is not considered to be wholly intrusive due to the screening

offered by the Scouts Hut, existing trees and vegetation, as shown in the North elevation within figure 5 and also figure 6.

8.11 The visual relationship and historic association with MM254 and MM231 takes precedence in key eyelines which make a significant contribution to the understanding of Roman Caerleon and the relationship between adjoining monuments and their historic uses, including the notable openness which contributes to the monuments setting.

8.12 Similarly, the Statement of Significance for Roman Caerleon identifies the international importance of Isca as deriving principally from the survival, legibility and interpretation of its internal layout, excavated remains and associated monuments, rather than from long-distance views beyond the fortress. The experience and understanding of the monument are largely inward-facing, focused on the preserved barrack blocks, defences and street alignments, which are not materially affected by the proposed development.

8.13 Whilst acknowledging that the hydrant tank will be marginally visible from MM230, its positioning attempts to mitigate visual impact through its location behind existing built form (closely aligned to the position of the now demolished Care Takers Building) and existing 2.2 metres boundary wall.

8.14 To mitigate visual impact even further and in direct response to comments received by Cadw the height of the hydrant tank has been reduced to 2.7 meters from the previously proposed 3.3 meters. Whilst the timber featheredge fencing is now proposed at an increased height of almost 3 metres in comparison to a previous 1.8 meters and will be aligned with the fascia height of the existing Scouts Hut. A comparison of amendments between the previously and newly proposed tank height and boundary treatment is shown on Figure 7 (see overleaf).

8.15 In conclusion, the hydrant tank would introduce a new element of a utilitarian nature, but this would not interrupt the visual relationship between the fortress and associated monuments and is very minor in nature with only the very top of the tank being visible beyond the existing Scouts Hut.

8.16 As a result, the relocation of the hydrant tank is likely to have a *neutral* impact upon the setting of MM230 Caerleon Legionary Fortress.

Figure 7: Comparison of amendments between the previously and newly proposed tank height and boundary treatment (Viewed from MM230)



NORTH ELEVATION
Scale: 1 : 100

Newly proposed lower hydrant tank and increased height of boundary treatment.



NORTH ELEVATION
Scale: 1 : 100

Previously proposed higher hydrant tank and lower height of boundary treatment.

MM254 - Caerleon Civil Settlement: Area under Broadway Playing Fields

- 8.17 Similar to MM231, in terms of the setting of MM254 - Caerleon Civil Settlement: Area under Broadway Playing Fields, its primary historical and evidential significance lies in the survival of buried archaeological remains, while the importance of the site at ground level is derived mainly from its continued sense of openness and its contribution to the monument's communal meaning and wider group value.
- 8.18 The placement of the hydrant tank is almost directly adjacent to the Northern boundary of MM254. Therefore, the hydrant tanks relationship with MM254 and its open characteristics is critical.
- 8.19 The significance of Broadway Fields is derived in part from its open character, which is thought to reflect its former use as a parade ground and the presence of a Roman road connecting the western gate of the fortress with the quay on the River Usk, now represented by the modern Broadway.
- 8.20 Due to the proximity of the proposed hydrant tank, being adjacent to the monument, the principal effect on its setting would arise from the encroachment of built form in such close proximity to the boundary which could influence the perceived scale and openness of the monument's surroundings.

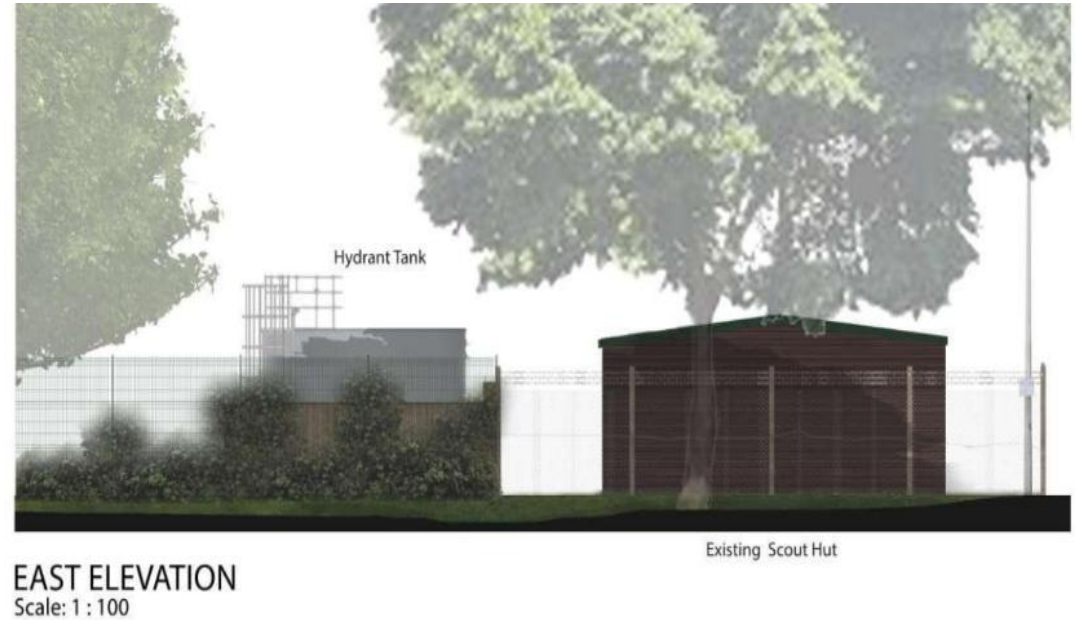
- 8.21 Whilst the effects cannot be entirely mitigated, existing vegetation along the eastern boundary of the school would help to filter views towards the tank. As a result, visibility from the monument is likely to be most apparent in close-range views, particularly near the boundary and from the footpath between MM254 and MM230. This footpath lies outside the Scheduled Monument area but facilitates public appreciation of the assets.
- 8.22 In contrast, the tank is likely to be less prominent in longer views across the open playing field reducing the proposals impact on the retained historic openness of the monument and is minor in comparison to the scale of the granted scheme which also runs in parallel to the monuments Northwestern boundary, albeit slightly further setback.
- 8.23 The proposal will have a *neutral to minor negative impact* upon the setting of Broadway Playing Fields particularly as a result of the introduction of additional built form adjacent to the monuments boundary. Nevertheless, the resulting change would be most noticeable in close-range views, with the wider openness of the monument and its setting remaining mostly unchanged due to existing boundary features.
- 8.24 Further mitigation is provided in the form of an increased height of boundary treatment and a reduction in the height of the hydrant tank when compared to the original proposals, a

comparison of the amends can be seen in Figure 8 (see overleaf).

Figure 8: Comparison of amendments between the previously and newly proposed tank height and boundary treatment (Viewed from MM254)



Newly proposed lower hydrant tank and increased height of boundary treatment.



Previously proposed higher hydrant tank and lower height of boundary treatment.

MM231 - Caerleon Civil Settlement

- 8.25 In relation to the setting of MM231 - Caerleon Civil Settlement, much of its historical and evidential value relates to below ground features. Whilst the significance of above ground features relates to the sites retained symbolic openness, communal and group value.
- 8.26 Caerleon Civil Settlement is largely located to the North-East of the site and is not visible from the area of proposed construction works. In this area no new structures are proposed, with the area remaining open for play provision and staff car parking, rather than the introduction of new built form only layout changes are proposed as part of the granted scheme.
- 8.27 As a result, it is considered that the proposal will have a *neutral impact* upon the setting and significance of MM231 - Caerleon Civil Settlement.

Caerleon Conservation Area

- 8.28 The site is directly adjacent to the Caerleon Conservation Area (CCA) and benefits from an existing permission for the construction of a new sports and teaching facility including altered parking arrangements and associated landscaping and infrastructure to which the previously submitted HIA identified a *minor positive impact* on the setting of the Conservation Area

through the removal of untidy and piecemeal blocks and the proposal providing a more coherent form and material quality in the backdrop of the Conservation Area.

- 8.29 The proposed relocation of the tank introduces a new utilitarian structure in close proximity to the Conservation Area boundary and, as a result, has the potential to influence views both into and out of the designated area. Notwithstanding this, the tank would be positioned directly to the rear of the existing Scout Hut and alongside established boundary vegetation and trees that run along the edge of the sports field being only extremely marginally visible above the height of the existing Scouts Hut.
- 8.30 The proposed tank would not alter the underlying character Conservation Area, nor would it detract from those elements that contribute positively to its significance. Accordingly, the resulting effect on the character and appearance of the Conservation Area is considered to be limited and would give rise to a *neutral impact* in the context of the wider school site and operations.

Caerleon Archaeologically Sensitive Area

- 8.31 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.

- 8.32 In line with the approved scheme the contractor is currently following a Written Scheme of Investigation which has been approved and discharged as a condition.
- 8.33 Subsequently, the watching brief associated with the WSI has been undertaken in conjunction with the groundworks associated with the development. During a recent phase of these works, a section of Roman wall was identified together with several metalised surfaces, a possible road segment and a curving ditch.
- 8.34 These remains are thought to be associated with the wider Roman landscape of Caerleon, including the nearby Caerleon Legionary Fortress (MM230) located to the north-east of the site and the Caerleon Civil Settlement Area under Broadway Playing Fields (MM254), which lies immediately adjacent to the south-eastern. Excavation and recording of remains is to take place in line with the approved Written Scheme of Investigation which can be provided on request.

9. Overall Heritage Impact

- 9.1 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.
- 9.2 The cumulative impact of the proposed amendments has been assessed in the context of the consented sports and teaching facility, which has already been determined to be acceptable. The proposed relocation of the sprinkler and hydrant tanks introduces additional built form within the setting of several heritage assets, including the Caerleon Legionary Fortress (MM230), Broadway Playing Fields (MM254) and the Caerleon Conservation Area
- 9.3 However, the tanks represent a relatively minor addition to the wider approved development and do not materially alter the overall scale, form or visual relationship between the consented scheme and the surrounding heritage assets.
- 9.4 Whilst slight minimal adverse impacts to the setting of MM254 have been identified, these are limited to localised visual changes within the setting of the monuments with the newly proposed hydrant tank being only marginally visible from key views. Therefore, it is considered the proposal would result in

cumulative *neutral impact* arising from the introduction of the hydrant tank in its newly proposed location.

Exceptional Circumstances

- 9.5 Considering the nature of concerns raised by consultees it is necessary to consider paragraph 6.1.24 of Planning Policy Wales which states:

“Where nationally important archaeological remains and their settings 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 negative impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a demonstrably and unacceptably damaging effect upon its setting.”

(PPW 2024, paragraph 6.1.24)

- 9.6 It is not considered that the proposal would have an unacceptably damaging effect upon the setting of identified monuments as the proposal does not introduce a new development into an otherwise undeveloped setting. Instead, it seeks to amend the location of infrastructure required to serve

a development that has already been determined acceptable on an existing school site.

9.7 In light of the above it is important not to view the proposed relocation in isolation but instead in the context of the approved scheme and its associated benefits which have previously been accepted.

9.8 The amendments facilitate essential fire-fighting infrastructure that is fundamental to the safe operation of the approved scheme and without it, the new building would not be able to be occupied leaving the school without sufficient teaching capacity.

9.9 The need for the relocation has arisen through detailed design development and fire safety requirements following the granting of planning permission and is not an optional change, being directly requested by the Fire Engineer and the Assistant Chief Fire Officer who has stipulated that *“Hydrant tanks must be relocated within 90 metres of building entry point or riser inlet point.”*

9.10 The justification for the proposed location has been put forward by the Fire Engineer who states:

“The hydrant tank is located in the south-eastern corner of the site adjacent to the emergency access route, as this is the only position that provides safe, direct and

unobstructed access for fire service vehicles to approach and operate effectively on suitable hardstanding.

The configuration of the site—including the building footprint, sports pitches, pedestrian areas, landscaping and established access routes—precludes alternative locations further away, as these would introduce access constraints or conflict with the site layout. As such, the proposed position represents the only practical and viable location that maintains safe and effective fire service access within the constraints of the site.”

9.11 The provision of effective fire-fighting infrastructure is essential to safeguarding the health and safety of pupils, staff and visitors and is fundamental to the safe operation of the approved development. In these circumstances, it is considered reasonable that any minimal heritage impacts that may be of concern to consultees could be outweighed by the clear and substantial public benefits associated with delivering a safe, compliant and operational educational and sporting facility.

9.12 Having identified limited opportunity for the relocation of the hydrant tank in any other amended location, it is important to highlight that without being located in the proposed location the building would not be able to be safely occupied, this would

prevent the educational, sporting and community benefits which were key to the justification of the approved development from being delivered and with the proposed relocation being essential for the continued safe operation of the school site.

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 Prysg

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 Principia 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.

[Caerleon Civil Settlement: Area under Broadway Playing Fields \(ref: MM254\)](#)

The following provides a general description of the Scheduled Ancient Monument. The monument consists of the remains of a civil settlement, or canabae, of Roman date on the W side 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. The main focus for the settlement is the road leading from the W gate of the fortress to the quay on the River Usk, the modern Broadway, although settlement structures have also been recorded on the NW side of the fortress. Excavations in the 1950s on the N side of Broadway revealed a complex of settlement remains. The earliest structural evidence was from timber buildings contemporary with the establishment of the fortress, which were later replaced in stone when the canabae was established. Excavation evidence also revealed that in the late 1st or early 2nd century AD part of the civilian settlement to the N of Broadway, that closest to the fortress, was cleared of buildings and a metalled surface laid. It is thought that this area was then used as a parade ground. Recent geophysical survey has revealed that substantial remains still survive under the modern playing fields. 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.