

APPLICATION DETAILS

No: 25/1030 **Ward:** Caerleon

Type: Full (Major)

Expiry Date: 1st April 2026

Applicant: *Newport City Council*

Site: *Caerleon Comprehensive School Cold Bath Road Caerleon Newport South Wales*

Proposal: ***CONSTRUCTION OF A NEW SPORTS AND TEACHING FACILITY INCLUDING ALTERED PARKING ARRANGEMENTS AND ASSOCIATED LANDSCAPING AND INFRASTRUCTURE***

Recommendation: **GRANTED WITH CONDITIONS**

1. INTRODUCTION

- 1.1 Caerleon Comprehensive school's built form and learning spaces are dated. As a result, there is a need to deliver a modern, fit for purpose, replacement learning block and sports facilities, including upgrades to existing spaces, in order to provide a modern learning environment whilst also offering a facility that the local community can use and benefit from. This proposal forms part of a wider initiative that seeks to improve the existing facilities at the school.
- 1.2 The school is located at the southern edge of Caerleon. The school site is accessible from Cold Bath Road and an unnamed road adjacent to Caerleon AFC football pitch. The application site is bound to the north by the Caerleon Cemetery and the Cold Bath Road allotments. Caerleon golf course bounds the site to the west. Further to the south, the River Usk forms a natural curving boundary to the golf course. Caerleon Rugby club is located to the south-east of the site, whilst the Roman Barracks are to the north-east. Some boundaries are defined by mature vegetation. The site is circa 1.74 ha and therefore is major development for the purposes of planning classification, hence it being presented to the Planning Committee for determination.
- 1.3 The school consists of various buildings ranging from 1 to 3 storeys. These are predominantly brick with some curtain walling but a variety of bricks are evident. Several existing buildings are flat roofed, some pitched and some are demountables. The original buildings date back to the 1960's, with alterations and extensions added since. The gymnasium block and headteachers block were constructed in the early 1970's. A 2 storey teaching block was constructed in the early 2000's and a number of portacabins have been added to the site throughout the years. The gym building, and the other gym attached to A block, are vastly undersized compared to current sports standards for both school and community use, therefore these have consent to be demolished with the space replaced in the new proposed building.
- 1.4 The site is located within the urban boundary and within the Caerleon Archaeologically Sensitive Area. It is situated close to the Caerleon Conservation Area; Scheduled Ancient Monument(s); Countryside; River Usk Special Landscape Area; and an Area of Safeguarding of Mineral Resource.
- 1.5 The scheme has been subject to discretionary pre application discussion and advice with officers and a statutory pre application consultation exercise has been undertaken. These discussions have evolved the design and supporting information.
- 1.6 The proposal includes the construction of new sports and teaching facilities, including altered parking arrangements and landscaping. The new building is proposed to be 2 storeys (approximately 9.65m) in height with a flat roof with space for PV panels and is located adjacent to the south-eastern boundary of the school site. It's longest southern side will be approximately 77m and the building will be approximately 23m deep. For

comparison, the retained teaching block A measures approximately 11.5m high, 15m deep (main three storey section only) and 60m wide (main three storey section only) and significantly wider and deeper than this when accounting for all lower storey additions that form part of this main block.

- 1.7 The proposed development has been screened under Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is concluded that the development is unlikely to have a significant environmental effect and is not EIA development

2. RELEVANT SITE HISTORY

25/1033	PRIOR APPROVAL FOR DEMOLITION OF BUILDINGS D1, D2, L G, H, A (PARTIAL), K AND D3 – prior approval is granted 05/02/26
25/0812	Prior notification of demolition of buildings D1, D2, L, G, H, A (PARTIAL) K and D3 - Prior Approval Required 12/11/2025
25/0748	Placement of temporary sports hall – Granted with conditions 30/10/2025

3. POLICY CONTEXT

- 3.1 THE NATIONAL DEVELOPMENT FRAMEWORK: FUTURE WALES - THE NATIONAL PLAN 2040

Future Wales sets out the Welsh Government's land use priorities and provides a national land use framework for SDPs and LDPs. Future Wales concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas that need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.

Policy 1 - Where Wales Will Grow

Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking

Policy 9 - Resilient Ecological Networks and Green Infrastructure

- 3.2 PLANNING POLICY WALES (EDITION 12) 2024

3.3 - Good design is fundamental to creating sustainable places where people want to live, work and socialise.

3.4 - Meeting the objectives of good design should be the aim of all those involved in the development process and should be applied to all development proposals at all scales.

- 3.3 NEWPORT LOCAL DEVELOPMENT PLAN (2011-2026)

- SP1 Sustainability
- SP2 Health
- SP3 Flood Risk
- SP8 Special Landscape Areas
- SP9 Conservation of the Natural, Historic and Built Environment
- SP12 Community Facilities
- SP14 Transport Proposals
- SP18 Urban Regeneration
- GP1 Climate Change
- GP2 General Amenity
- GP4 Highways and Accessibility
- GP5 Natural Environment
- GP6 Quality of Design
- GP7 Environmental Protection and Public Health
- SP4 Water Resources
- SP9 Conservation of the Natural, Historic and Built Environment
- T4 Parking
- W3 Provision for Waste Management Facilities in Development

- CE3 Environmental Spaces and Corridors
- M1 Safeguarding of Mineral resource

3.4 SUPPLEMENTARY PLANNING GUIDANCE

- Archaeology & Archaeologically Sensitive Areas (December 2025)
- Parking Standards (August 2015)
- Wildlife and Development (December 2025)
- Trees, Woodland Hedgerows and Development Sites (January 2017)
- Development Management Air Quality (February 2018)

4. CONSULTATIONS

4.1 NATURAL RESOURCES WALES:

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following conditions to any planning permission granted:

Condition 1: Construction Environmental Management Plan

Condition 2: Land Contamination

Please note, without the inclusion of these conditions we would object to this planning application. Further details are provided below.

Protected Sites

As previously advised, the application site is situated approximately 150m from a watercourse which is likely to be hydrologically connected to the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) approximately 450m away. Given the scale of the redevelopment and its proximity to the River Usk SAC/SSSI we recommend a condition regarding a Construction Environmental Management Plan (CEMP) is attached to any planning permission granted. A CEMP has been submitted as part of the planning application and we requested in our previous response (dated 12 January 2026, our reference: CAS-294713-K7X7) that it be updated to address a number of points with regard to the environment, protected sites and European protected species.

We have considered the updated CEMP document titled 'Construction Environmental Management Plan (CEMP) Main Works, Caerleon Comprehensive School, Newport' Revision 4 dated 27.01.26. We advise that it has not addressed all our concerns. We therefore continue to advise that the CEMP condition as set out in our pre-application response (our reference: CAS-282251-B7D8) is attached to any planning permission granted. We continue to advise that the CEMP should address the following:

1. Some details on an emergency response plan are given in section 6.6; however, we do not consider this as being appropriate or fit for purpose in its current form. Further details and site specific considerations should be provided in an updated CEMP.
2. It is noted on page 34 that there will be a Surface Water Management Plan (SWMP) and Silt Containment Plan forthcoming for the development. These plans should be included within an updated CEMP.
3. We note reference to trade effluent consent on page 34 of the CEMP. We advise all trade effluent discharges intended for implementation should be sought via communication with Dŵr Cymru / Welsh Water. Any changes in discharges (i.e. to a watercourse) should not be undertaken until consultation with and approval by NRW is complete. This should be reflected in an updated CEMP.
4. We note the pollution prevention plans/guidelines intended for use (page 34). We advise site specific silt mitigation measures should be included in the SWMP. We also advise that the CEMP should be amended in relation to European protected species. Please see below for our comments on this.

At this stage, we cannot rule out the proposal having a likely significant effect on the River Usk SAC. As such, we advise your authority that the proposal will need to be considered under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). Your authority is the Competent Authority for the purposes of the Conservation

of Habitats and Species Regulations 2017. As such, you must not agree to any plan or project unless you are certain it will not adversely affect the integrity of a SAC. You should carry out a test of likely significant effects (TLSE) for the River Usk SAC, which is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017. This test applies to impacts on the SAC from the proposed works, either alone or in combination with other plans and projects. If the test concludes there is likely to be a significant effect(s) then an Appropriate Assessment of the impacts on the SAC from the proposed works, either alone or in combination with other plans and projects, will be required.

European Protected Species

Our advice in our previous response remains, repeated below for ease of reference. We draw your attention to our advice regarding the CEMP document. At pre-application stage we noted ecological information ('Caerleon Comprehensive School, Newport Bat Emergence Survey Report' Issue 1, dated 5th December 2024, by Ecology Wales) identified that bats are present at the application site, in building K.

The submitted Planning Statement and Green Infrastructure Statement make reference to an updated survey of structures (October 2025) which confirms the presence of a pipistrelle bat still in building K but also evidence of bats, presumed to be low numbers of pipistrelle, in building D1. However, the updated structure inspection survey report has not been submitted with this application. We therefore advise you liaise with your Authority's ecologist as to whether more information needs to be submitted. We note that an EPS licence is required to demolish both buildings. We also note the submission of a CEMP document. This document makes reference to bats. However, it does not reference the need for an EPS licence and only makes reference to building J being considered to be of moderate potential to support roosting bats and the need for a survey. It does not reference buildings D and K (to be demolished) which are confirmed bat roosts. The CEMP document should therefore be amended to address the above and the need for an EPS licence, and we advise liaison with your Authority's ecologist regarding the need for further survey. From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document 'Natural Resources Wales Approach to Bats and Planning (2015)'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. We recommend that you discuss the need to secure any avoidance or mitigation measures with your internal ecological advisor. We advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site. Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Land Contamination

Our advice in our previous response remains, repeated below for ease of reference. We note from our historical map database that a fuel tank may be present in the north-east corner of the site. However, we consider this risk can be managed by the following planning condition being secured to any consent granted:

Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in

writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

4.2 **POLICE ARCHITECTURAL LIAISON OFFICER:**

From examining the crime/incident data, I am satisfied that the proposed development location is not in a high crime or vulnerable location. There are no crime trends or patterns affecting the area and any reported calls appear to be one off isolated incident. I can confirm that the current call volume and demand from the area is not having a detrimental effect on Policing or the community within the location. At this time, I do not have any clear objections to the application based on the current crime/incident rate and demand on policing and the community within.

When offering crime prevention and physical security advice we take guidance and best practice from the range of guides supplied by Secured by Design (SBD). Whilst the client is not seeking SBD accreditation for the development I have made recommendations below for the site.

It is recommended the whole of the school buildings, MUGA's and all-weather pitches must be protected by fencing. The fence must meet Secured by Design standards and specifications, be at least 2.4 metres high, weld mesh, expanded metal or similar, and be of a design that is difficult to climb over.

The design of the building should take into account the need to prevent features which aid scaling or climbing. For example, rainwater downpipes should be either flush fitting (i.e. square profile) or concealed within the cavity so they nor other features cannot be used as a climbing aid to get on the roof and/upper levels/furniture. It is recommended that ground floor materials should predominantly be brickwork to prevent vandalism. As graffiti tends to attract further graffiti, police will always advise that it is removed as soon as possible. Designers should therefore consider wall finishes that make this task easier to perform, particularly when the risk of graffiti is high. Surfaces should be coated with either an anti-graffiti glaze or sacrificial coating, or alternatively be designed for ease of maintenance e.g. painted in the event of a graffiti attack. Alternative measures for reducing or eradicating graffiti may also be considered such as growing an appropriate non-invasive climbing plant up the wall Outside covered areas can be problematic and therefore must be protected by CCTV and lighting.

Access from the lobby/reception area into the main school must be controlled by access control. In addition entry into all rooms where valuable equipment is sited e.g. offices, computer rooms etc. must be controlled and these rooms must be kept locked when not in use. Access from the community area into the rest of the school must also be controlled via access control when the area is in use by the general public. I would like to see an ability to lock down the site securely should there be an increase in threat and that appropriate doors and locking mechanisms are in place to achieve a reasonable delay both externally and internally creating layers of delay. The doors leading into open/event spaces need to be able to be secured and give some resilience and delay from a determined intrusion. This will allow time for escape and a delay to allow a response. There needs to be a means to communicate a threat throughout the building in order to facilitate a lock down of the building, i.e. alarm or tannoy system. It is recommended that a video access control system is utilised to allow confirmation of the identify of an individual before allowing access to the grounds. This can be through a video system linked to the perimeter access gates and main school reception. There should not be an emergency egress green button installed within the public space to prevent misuse by agitated persons.

The number of public entrances into the school must be reduced to the minimum practicable and must be clearly signed and well illuminated. It should be possible to reduce the number to one during school hours, which must be clearly signed and well illuminated. All visitors must sign in and out and wear visitor badges.

4.3 **SENIOR FIRE PREVENTION OFFICER:**
No objection raised, standing advice given.

4.4 **HENEB:**
The information in the Historic Environment Record (HER) curated by this Trust shows that the proposed development site is located in an area of high archaeological potential, within the Roman canabae (the civilian settlement), immediately adjoining the fortress of Isca at Caerleon. Adjacent areas have statutory protection and are Scheduled Monuments: to the north, Caerleon Civilian Settlement Cadw ref: MM231, to the east Caerleon Legionary Fortress Cadw ref: MM230 and to the south and west Caerleon Civilian Settlement (Broadway Playing Fields) Cadw ref: MM254. Archaeological work over a number of years has shown the survival of remains of buildings and building material, roads, and a variety of finds relating to the Roman occupation, in the area of the school. Indeed a field evaluation conducted in 2011 on the school noted a Roman occupation layer and Roman ceramics. The proposed development involves the construction of a new sports and teaching facility including altered parking arrangements and associated landscaping. We note the consultation with Cadw and concur with their recommendations to amend the Historic Impact Assessment. Therefore, we request that the applicant, their agent or their archaeological contractor make the necessary amendments.

4.5 **NATIONAL GRID:** no response received to date.

4.6 **SPORT WALES:** no response received to date.

4.7 **CADW ANCIENT MONUMENTS:**
Having carefully considered the information provided, we have no objection to the proposed development in regards to the scheduled monuments or registered historic parks and gardens listed in our assessment of the application below.

Assessment

Scheduled 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

A Heritage Impact Assessment following the guidance given in the Welsh Government document "Heritage Impact Assessment in Wales" has been submitted in support of this application.

This document correctly analyses the settings of the scheduled monuments and assesses the impact of the proposed development on it. It concludes that whilst there is a possibility of an adverse impact, the design of the building and the additional planting proposed in the application will ensure that there will be a neutral impact. We concur with this conclusion.

4.8 **WELSH WATER:**

The proposed development site is located in the catchment of a public sewerage system which drains to Nash Wastewater Treatment Works (WwTW). We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. However, with respect to the accompanying 'Proposed Foul Drainage Overview' (Drawing No. 0505), it is unclear where the development proposes to connect to and we would advise that a connection to the adjacent rising main is unacceptable under all circumstances. Therefore, for completeness, we recommend a foul drainage scheme pre-commencement condition.

Turning to surface water drainage, as of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. In this instance, we offer no objection to proposals for disposal of surface water flows into a private surface water sewer, in principle, subject to consultation and agreement with the regulatory body or riparian owner of this system.

In addition, this site is crossed by public sewers with their approximate position being marked on the attached statutory public sewer record. In accordance with the Water Industry Act 1991, Dwr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. Having regard to the 'Site Block Plan – Proposed' (Drawing No. CCS-HLM-00-00-DR-A-00002), it appears the proposed development would be situated outside the protection zone of the public sewers measured 3 metres either side of the centreline and therefore acceptable in principle.

Accordingly, if you are minded to grant planning consent for the above development, we would request that the following Condition and Advisory Notes are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets:

Condition

No development shall commence until a foul water drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul water flows and thereafter implemented in accordance with the approved details prior to the occupation of the development.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment

Capacity is currently available in the water supply system to accommodate the development. We reserve the right however to reassess our position as part of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.

5. INTERNAL COUNCIL ADVICE

5.1 NCC HIGHWAYS OFFICER:

Parking

It's stated that there are 90 parking spaces available within the school. This consists of 60 spaces which are accessed through the school's main gate and 30 spaces which are accessed through the secondary gate.

The proposal seeks to significantly improve the parking provision at the school which consists of the following:

Accessed via main gate

- 65 car spaces. The 65 car parking spaces include 8 accessible spaces for blue-badge holders and 13 EV charging spaces
- 2 minibus
- 7 motorcycle parking spaces will be accessed from the school's main entrance.

Accessed via Secondary access

- 29 car parking spaces

The above results in a total of 129 spaces which results in the parking provision being increased to meet the requirements of the Newport City Council Parking Standards SPG.

Trip Generation

The proposal will not increase the school's capacity and therefore there will no change in trip generation associated with the school.

It's acknowledged that the new sports hall and 3G pitch will be made available to the community outside school times and this is also an existing arrangement.

The applicant has submitted a revised CEMP (REV4) which generally satisfies all the previous matters raised. The only matter in question relates to the PROW (Appendix 3). I previously commented as follows:

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

It's noted that there is an existing public right of way (389/4/1) and active travel route (NP-CAE-P0020) which runs from the main access to the secondary access through the sports field. This route is does not benefit from a hard paved surface and therefore it may not be suitable for disabled users or during inclement weather. To address the concerns raised the PROW/active travel route should be upgraded and hard paved so that the section of road

subject to an increase in traffic can be circumnavigated by cyclists and pedestrians. This would mitigate the highway safety issue raised

Appendix 3 proposes to use unbound material to update the PROW, in my view the footpath should be hard paved but I accept that this is a matter for active travel and the public rights officer. It would appear that an improvement to the PROW/active travel route is achievable which mitigates the issue raised in regard to Cold Bath Road and increased potential for conflict between vehicles, pedestrians and cyclists. Subject to the improvement being conditioned I would offer no objection to the application.

Swept path analysis

A swept path analysis (SPA) has been submitted to demonstrate that a fire tender can access the school. The SPA demonstrates that a fire tender can access the school through the main gate and secondary access. It should however be noted that the school will need to maintain appropriate management of the car park to ensure that vehicles only park within bays to ensure access is maintained within the site. This is matter for the school.

The Swept Path Analysis' are acceptable and demonstrate that the turning manoeuvres are achievable".

Travel Plan

Whilst it's accepted that the school is existing the inclusion of a travel plan is welcomed.

5.2 **NCC ENVIRONMENTAL HEALTH OFFICER:** no response received to date.

5.3 **NCC WASTE OFFICER:**

We anticipate a requirement for trade waste and recycling.

5.4 **NCC DRAINAGE/SAB:** no response received to date.

5.5 **NCC PROW OFFICER:** notes points that must be considered when affecting a PROW.

5.6 **NCC ECOLOGY OFFICER:**

As the proposed development entails demolition of some buildings, a concern with this proposal is the impact upon roosting bats, which are European protected species. The bat survey information in support of this application is set out in two reports, the Bat Emergence Survey report dated 5th December 2024, and the Green Infrastructure Assessment from November 2025.

Bats were detected in building K in the 2024 emergence survey, and in buildings K and D1 of this site during a site visit in October 2025 to inform the GI Statement. As a result of these surveys, I accept the conclusion that this represents a low-risk case in accordance with the NRW Approach to Bats and Planning Good Practice Guide 2015. NRW confirmed their agreement of this in their letter of 12th January 2026

Therefore there is no need to obtain further advice from NRW, provided we secure the mitigation measures set out in a suitable bat survey report. In general the submitted reports are satisfactory in my view, and the 2024 emergence survey report recommends compensation for loss of the roost in building K in the form of 4 No. Beaumaris Woodstone Bat Boxes or similar.

However the 2025 GI Statement survey detected two bat roosts but also recommended that four integrated bat boxes are included within the new buildings. The rationale is that two boxes are compensation for the two roosts lost to demolition, and the other two boxes represent a biodiversity enhancement.

In principle, I agree that four bat boxes is adequate compensation and enhancement for the loss of two very small roosts of relatively common bat species. These boxes should be erected initially on nearby trees at a height of 3 metres, and then ideally on the south east elevation of new buildings at a height of no less than 3m, just under the eaves. As recommended in the Bat Emergence Survey report, these should consist of 4 No. Beaumaris Woodstone Bat Box or similar specification such as Schwegler 1FF.

All of the mitigation measures as set out in section 6 of the Bat Emergence Survey report and section 7 of the GI Statement should be secured by planning condition.

In their letter of 12th January 2026 NRW have invited us to carry out a test of likely significant effects (TLSE) for the River Usk SAC, which is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017. This test applies to impacts on the SAC from the proposed works, either alone or in combination with other plans and projects. If the test concludes there is likely to be a significant effect(s) then an Appropriate Assessment of the impacts on the SAC from the proposed works, either alone or in combination with other plans and projects, will be required.

In this instance, the nearest watercourse which flows directly into the River Usk is about 350m to the northwest. I find it very unlikely that any dust, waste, materials, surface-water run-off, contamination or mobilised ground contaminants arising from construction will be able to migrate to this watercourse over this distance. Migratory fish are features of the River Usk SAC and these are sensitive to disturbance caused by vibration during construction. However NRW have advised that such disturbance effects only occur within less than 30 metres of the river, and the proposed development is very much further from the River Usk than 30 m.

Otters are also a feature of the River Usk SAC, but the site of the proposed construction is already developed land, and does not support any habitats that otters could use for breeding or resting. There are formal hedges and tree-lines nearby, but these do not connect the River Usk with any other suitable otter habitats, so I think disturbance during construction is unlikely.

Therefore my advice is that the proposed project is not likely to have a significant effect, either alone or in combination with any other developments, upon the features of the River Usk SAC or any other site in the National Sites Network. This being the case, we do not need to undertake an 'Appropriate Assessment', nor re-consult NRW. Section 4.4.1 of the GI Statement agrees that due to the scope of the works, the River Usk and connecting habitats will not be impacted by the proposals.

The CEMP condition proposed by NRW includes generic measures to avoid contamination of the natural environment during construction, which I support. However, applying this planning condition is not essential to the conclusion of no likely significant effect upon the River Usk SAC.

As some buildings are to be demolished and trees removed, the Applicant should be reminded to avoid disturbance to nesting birds which are protected under the Wildlife and Countryside Act 1981: Part 1, 1(1)(b), whereby it is an offence to intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built.

In all other respects, the GI Statement is acceptable.

5.7 **NCC LANDSCAPE OFFICER:**

I have no objection to the proposals.

A Landscape GA Plan by HLM is submitted which shows retained and removed trees, along with new tree planting and SUDs rain gardens however no further detail is available. The detail could be conditioned but species, locations, size at planting, density, and an outline planting and maintenance plan is required all as advised at pre-app stage. Shading from the new block onto the courtyard rain gardens should be analysed. Tree retention and new tree planting is proposed to the Caerleon Conservation Area boundary to the south-east boundary onto open playing fields which is welcome. Note that the new building and new drainage runs are very close to existing trees. The parking area extends south to prevent structure planting along the west-east green corridor meeting the north-south corridor. The proposal is for ornamental ground cover planting, can a more vertical character screen planting for this c25m gap be reviewed which would also help green infrastructure links.

5.8 **NCC SENIOR SCIENTIFIC OFFICER:** no response received to date.

5.9 **NCC PRINCIPAL HERITAGE OFFICER:**

The proposal does not directly affect any listed buildings. However, the site lies within the archaeologically sensitive area of Caerleon, where several HER events/sites are recorded nearby. It is also located outside - but immediately adjacent to - the Caerleon Conservation Area. Several Scheduled Monuments (SMs) surround the site, including MM230 (Caerleon Legionary Fortress) to the east, MM254 (Caerleon Civil Settlement: Area under Broadway Playing Fields) directly to the south, and MM231 (Caerleon Civil Settlement) further south-west. The Caerleon Conservation Area also lies directly to the south and east.

Existing

As noted at pre-application stage (and in relation to 25/0812 PRNO), the buildings proposed for demolition are unlisted and of limited architectural merit. They comprise a multi-phase complex of late-20th/early-21st-century school buildings, presenting a fragmented and utilitarian backdrop in views of principal heritage concern (particularly from the south and south-east). These existing structures do not make a positive contribution to the setting of the Conservation Area or adjacent Scheduled Monuments. Their removal is therefore not considered harmful to the understanding, experience, or appreciation of these heritage assets.

Proposed

The scheme includes a large new detached building and adjacent car park. The building will be the most visually prominent element of the scheme, positioned along the partially tree-lined southern boundary contiguous with both the Conservation Area and SM MM254. It will be most visible from the south (see Views 4 & 5, pp. 87–88 of the DAS).

The proposed two-storey, flat-roofed brick building was deemed acceptable in scale and form at pre-application stage, with key concerns focused on façade articulation and materiality. The use of a simple, uniform dark brick palette is welcomed, providing a generally cohesive and robust elevation. The southern façade retains a high solid-to-void ratio, creating large expanses of brickwork. This is mitigated by recessed panels that introduce rhythm across the elevation and, if sufficiently set-back, will suitably articulate the façade. Ground-level doors (and their arrangement) will have very little prominence within those views under consideration.

As such, reveal depth of brick recesses and windows will be critical to the success of such a design approach. Current proposals suggest 50mm for recessed brick features and a minimum of 100mm for window reveals. I would still suggest that these details be secured prior to determination through suitably scaled construction drawings (similar to section drawings on p.80 of the DAS).

Brick samples have been produced on site. A single brick type is preferred; of those presented, Ibstock “Antique Red” offers the best dark-red tone and texture, adding subtle visual interest if carefully articulated.

Integrated window shading is proposed on the southern elevation to address future weather demands. A dark finish is preferable, avoiding bright accents. On clear days, these features will cast subtle, shifting shadows, helping to break up the building mass when viewed through the treeline. Additional planting along the southern boundary will further soften views (and should be secured via condition as necessary). Ideally, details for external shading should also be secured up-front, via suitably scaled drawings as suggested above. At the eastern end of the southern elevation, a projecting glazed corner is proposed, adding visual relief to an otherwise solid façade - particularly important in views from the east (see View 3, p.86 of the DAS). High-quality flush-closing casement windows with a dark finish (dark grey/black) should be pursued to enhance depth within recessed panels. Such details should also be secured up-front wherever possible.

Archaeology

Heneb has been consulted; I defer to their expertise regarding potential below-ground heritage impacts.

Conclusion

Subject to submission of satisfactory details on material choices and façade articulation, it is considered that the proposal will not adversely impact upon the way in which neighbouring heritage assets are understood, experienced, or appreciated. Their setting will be preserved. I see that Cadw now share this view.

5.10 **NCC TREES:**

The application is supported by a Tree Protection Method Statement and Draft tree Protection Plan by Steve Ambler and Sons Tree Specialist, dated September 2025. The document, although thorough and identifying conflicts with existing trees is preliminary in form and has been produced without detailed designs for “No-dig” surfaces, construction of retaining walls and service installation methods being available. With some of the language being suggestive rather than committal and giving broad guidance on designs requirements than actual specifications. The proposals require the removal of four moderate grade trees (T5, T6, T7 and T8) from within the school's grounds. LANDSCAPE GA PLAN , CCS-HLM-00-00-DR-L-00007 indicates the installation of 13 replacement trees, some are in a restricted location along the southern boundary whilst others are located within the rain garden and potentially conflict with CB2183-CAM-XX-XX-DR-C-0500-S4-P02 - Proposed Drainage Overview where trees are being installed on or adjacent to the surface water drainage for the rain garden proposals and are likely to be problematic either immediately or as a result of future growth. In addition, details of soil fill will be required for the rain gardens as suitable soil for the rain gardens may not be suitable for long-term and sustained tree growth and survival. Opportunities are available for new planting within the proposed car parks and should be considered. This this will provide shade to parking and provide visual screening and softening within the local and wider landscape. Planting proposals should ensure sufficient soil availability for installed trees to reach their full design potential and be sustainable into the future. Additional Planting the East of the existing MUGA could also be provided to diversify the species mix and age class of the tree stock on site whilst providing shade and shelter to the students and mitigate the impacts of climate change.

Conclusion: Potential impacts are relatively minor and can be overcome through careful detailed design and implementation. Landscape planting should be more diverse so as to improve and enhance both the school and local area.

Recommendation: No objections subject to a conditions

Conditions: No development shall take place until a detailed Arboricultural Method Statement (AMS), consistent with BS 5837:2012 and including –

- design and implementation of new hard surface within the root protection area of retained trees,
- service design and installation requirements,
- Arboricultural site monitoring and supervision.

The AMS will be submitted to and approved in writing by Newport City Council . The development shall thereafter be carried out strictly in accordance with the approved AMS. The detailed AMS will include committal language of will, must and shall in reference to all operations which could impact retained trees.

Reason: To ensure construction works do not harm retained trees in accordance with Policy GP5 of the LDP.

5.11 **NCC ACTIVE TRAVEL:**

After review of the documentation, particularly the Travel Plan and Transport Statement, it appears that adequate cycle parking facilities are to be provided. This will tie into existing Active Travel provisions in the area.

As such, I would have no objection to this proposal.

6. **REPRESENTATIONS**

6.1 **NEIGHBOURS:**

All properties within 50m of the application site were consulted (6 properties), a site notice displayed 12th December 2025, and a press notice published in South Wales Argus 13th December 2025. No responses received.

6.2 **COUNCILLORS HUGHES, BAKER WESTHEAD AND COCKS:** no response received to

date.

- 6.3 CAERLEON CIVIC SOCIETY: no response received to date.

7. ASSESSMENT

7.1 Background

The site is an operational comprehensive school located within the urban settlement boundary. It was evident at site visit that areas of the school are in a poor physical condition and there are some shortcomings in terms of parking availability and general legibility on site.

- 7.2 There are approximately 1,500 pupils on the school roll. There are some 150 members of staff, including 88 teaching staff, 26 teaching assistants and support staff. We are advised that this will not change and the purpose of the project is not to increase school capacity. From visual inspection there is clear merit in the demolition of end of life units on site and the construction of a new building will offer enhanced educational facilities on an existing school site. This can be afforded significant weight in the decision-making process. Demolition works have already been consented and are not being considered as part of this application (LPA reference 25/1033).
- 7.3 However, the site has several constraints and the scheme will need to be considered having regard to relevant adopted planning policy and material planning considerations. In practice this means that the quality of information and supporting documentation accompanying the submission is critical to the consideration process.

Main Considerations and associated Policies

- 7.4 Policy SP12 is the key strategic policy of the current adopted LDP relevant to this project:
SP12 Community Facilities
The development of new community facilities in sustainable locations will be encouraged including:
- i) *places of worship and church halls, cemeteries, community centres, health centres, day nurseries, clinics and consulting rooms;*
 - ii) *museums, public halls, libraries, art galleries, exhibition halls, **education and training centres**;*
 - iii) *cinemas, music and concert halls, theatres, dance and sport halls, swimming baths, skating rinks, gymnasiums;*
 - iv) *outdoor and indoor sport and leisure uses including allotments and community/ city gardens. Development that affects existing community facilities should be designed to retain or enhance essential facilities.*

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

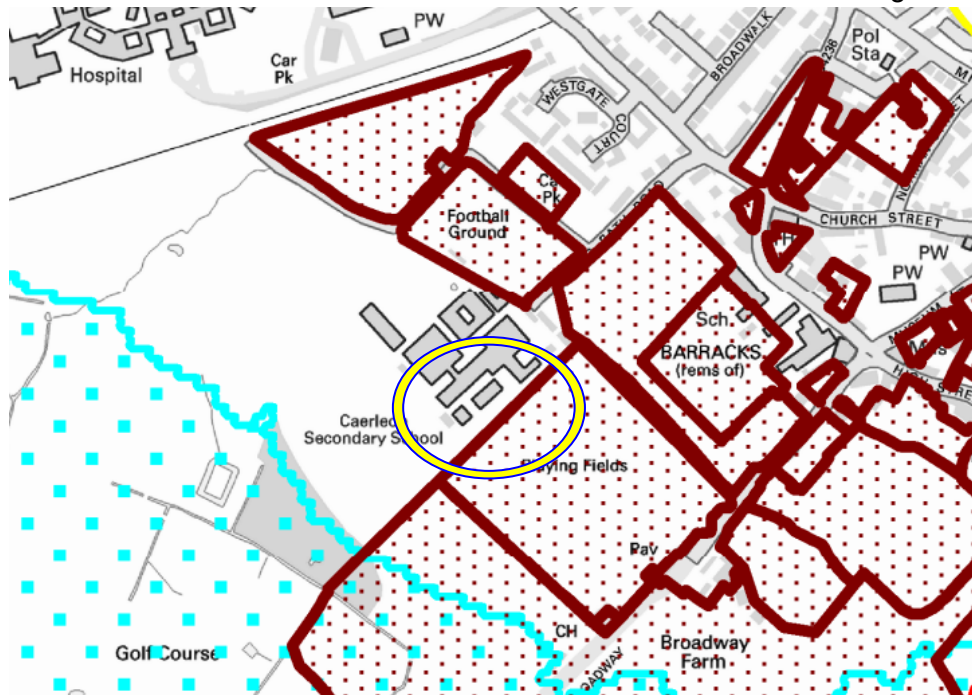
- 7.5 The key considerations based on the policy framework and site constraints identified above and having regard to the support for new community facilities (including education) identified in the policy above, are as follows:

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

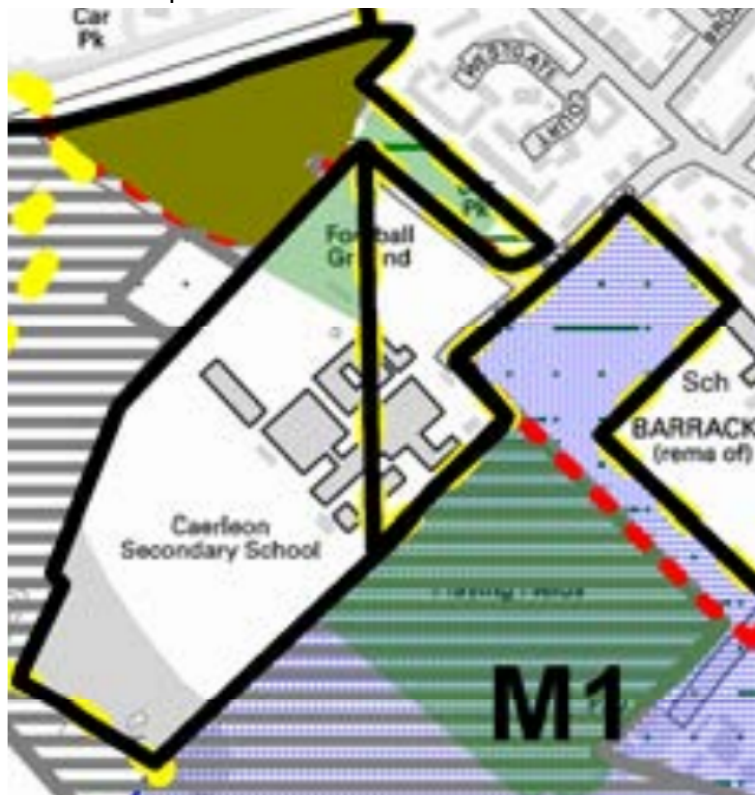
Secondary matters, based upon the information provided (notably the fact that school capacity will not increase) are:

- Flood risk
- Air Quality
- Residential amenity

The Adopted LDP Constraints Plan confirms as follows with red dotted areas indicating Scheduled Ancient Monument areas and blue dotted areas indicating flood risk zone:



The LDP Proposals Plan confirms as follows:



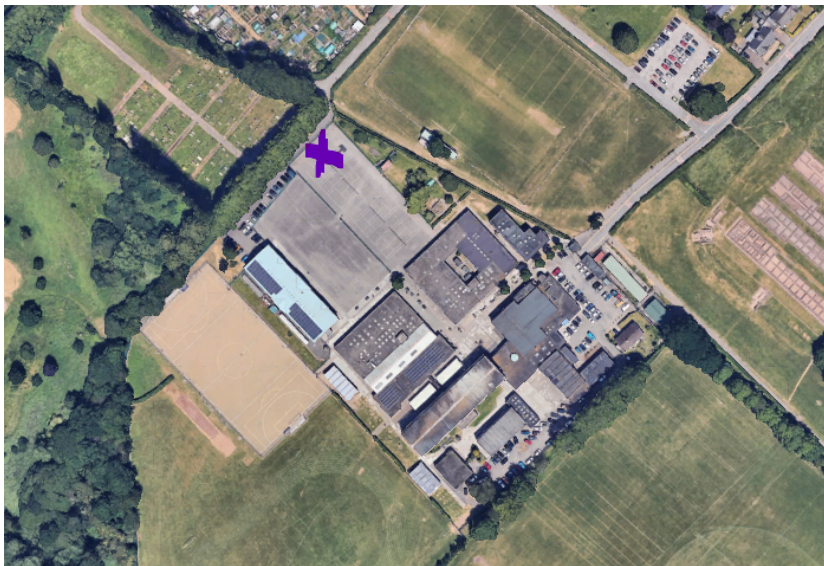
The yellow dashed line is archaeologically sensitive area, the light green shading is environmental space, dark green to the north is allotments, the black line is urban boundary, the blue shading is conservation area, the red dashed line is long distance walk/cycleway and the grey lined area is sand and gravel resource. We also know, but not clearly shown above, that the site is excluded from but enveloped by the River Usk Special Landscape Area.

7.6 Massing, Scale, Design and Location

Numerous areas of the existing school site are impacted by the works. The project will be visible from countryside, Special Landscape Area, Conservation Area and nearby public routes. Secondary buildings along the south eastern and south western boundaries will be demolished in their entirety. The buildings are in poor condition, contribute little to the site

aesthetic and their removal will have a positive impact upon site appearance. The removal of these buildings, some of which are end of life or poor quality spaces, will remove teaching and educational spaces and the new building is intended to replace such floorspace with multi purpose, modern facilities to enhance the educational experience for all users. Approval has already been given for demolition works.

- 7.7 Alterations to site layout are proposed in the northern and south eastern corners of the site. The purpose of these works is to enhance on site parking and some of these works are already in place temporarily. The Highways Officer supports the scheme in this respect, noting the uplift in on site parking proposed and officers note that the proposal offers visual benefits in consolidating and updating buildings on site that hinder its current legibility and circulation space and do not contribute to its appearance. To the north, changes proposed will impact existing hard surfaced courts by reducing the number and space available for them, rationalising the existing provision and adding additional parking. SportWales has not responded to this consultation and Policy CF1 is applicable. The aerial image below shows the court affected by the proposed works marked with a cross:



This area of the school site is defined as Environmental Space on the LDP Proposals Map (see above). Policy CE3 is therefore also relevant. For the avoidance of doubt, the relevant policies state:

CE3 Environmental Spaces and Corridors

In and adjoining the urban and village areas, and in areas identified for comprehensive development, sites having existing importance for their visual qualities, as wildlife habitats or for recreational or amenity purposes, will be safeguarded as “environmental spaces and corridors”. Development in these spaces will be permitted only where:

- i) the existing or potential environmental qualities of the site will be improved or complemented;*
- ii) there is no adverse impact on international, european, national, regional or local nature conservation interest;*
- iii) there is not a loss, without appropriate replacement, of a recreational, open space, or amenity resource for the immediate locality unless it can be demonstrated that there is an excess of provision or facilities can be enhanced through development of a small part of the site. Proposals to enhance or improve existing environmental space provision will be encouraged where practicable. Additional provision will be sought in areas where a deficit has been identified*

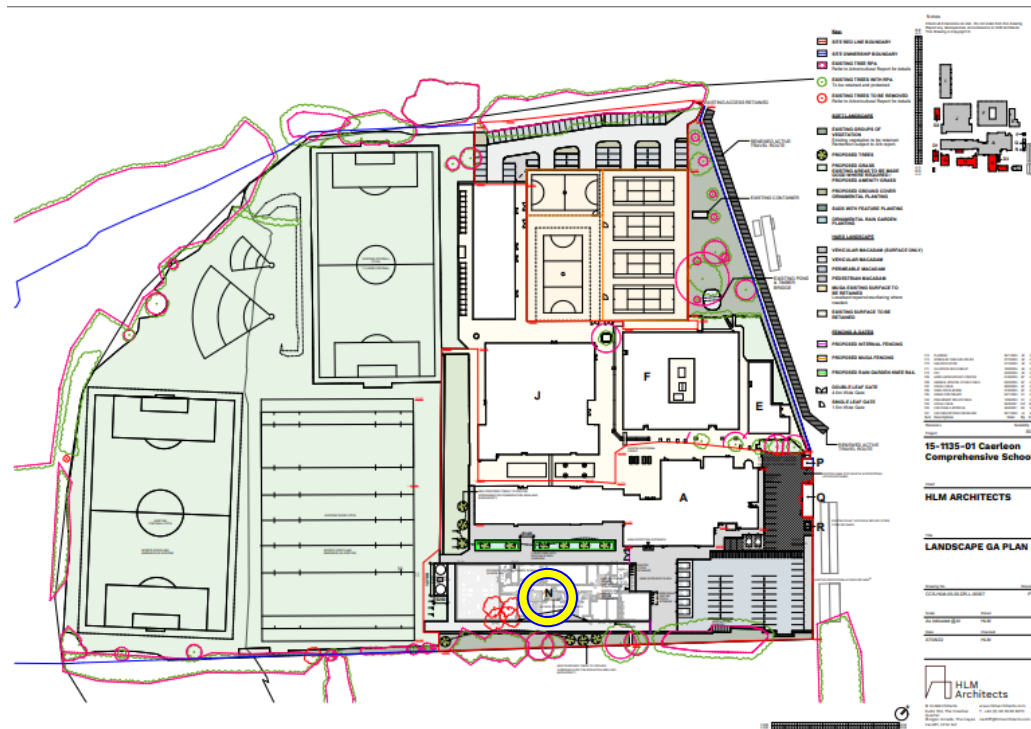
CF1 Protection of Playing Fields, Land and Buildings used for Leisure, Sport, Recreation and Play

The redevelopment for other purposes of playing fields, other land and buildings used for sport, recreation, areas of play and community uses, will only be permitted where:

- i) alternative provision of the same benefit is made available in the immediate locality;*
or

ii) *the land or building(s) is surplus to requirements.*

It appears clear that the environmental space identified on the LDP map covers an area of existing hardsurfacing that has little to no wildlife or amenity value and its recreational value is part of the wider school grounds. Similarly, whilst policy CF1 seeks to protect playing fields and land for recreation and sport, the area will continue to be used for this purpose, albeit in a different form and under the overall management of the wider school. Previous works to create a MUGA at the school site and proposed works to enhance indoor sports provision that will be available to the wider community outside school hours as part of this application are relevant to consideration of the scheme against the policies above. On this basis, the changes proposed in the northern portion of the site do not conflict with Policy CE3 in officer view and are compatible with Policy CF1 as will enhance on site provision of sports space, particularly indoors. Also, the proposed parking works only affect part of the existing court provision, the majority are retained and are potentially enhanced. i.e.



Insofar as the impact of parking expansion works upon general visual amenity is concerned, any change to visual receptors is unlikely to be of significant harm compared to the existing situation and the works unto themselves do not adversely impact the setting of the Caerleon Conservation Area and Scheduled Ancient Monuments. Cadw and the Council's Principal Heritage Officer share this view.

- 7.8 Turning then to the most notable element of the project in design and massing terms, that being the new detached school building proposed at the southern end of the site and annotated as "N" on the plan above. This new building will be located south of existing block A which is a 3 storey teaching block of typical school design and appears as the highest building on the school site. Block A is of brick finish with a shallow sloping roof with extensive areas of glazing or panelling across main facades.
- 7.9 Caerleon Comprehensive School as a whole is characterised by brick buildings and a simple materials palette is considered preferable for the proposed building. Brick is known to be a robust material, suitable for this type of use and a development that includes it as the primary finish is considered acceptable. The proposed building is of large scale, flat roof form and is open to public view albeit such views are screened in part by established landscape features and intervening buildings from some vantage points. Other brick buildings on site are of more traditional form and have used a variety of techniques to break up the monotony of brick work to mixed success. Some appear very dated. The proposed southern elevation has a high solid to void ratio and large expanses of brick to suit its intended function. It also likely assists in prevention of overheating in these spaces as the elevation is south facing and will receive direct sunlight for most of the day. i.e.



Interest is offered by the vertical recesses and projecting features, notably at the south eastern corner that will offer a large glazed wrap around window to serve an activity studio area that will be open plan to roof level internally. At the opposite end of the building will be the main sports hall which, in operational terms, will not support areas of glazing for safety and function sake. Consequently, openings are few and those provided are at high first floor level.

- 7.10 The western (end) façade shown above has no openings for these reasons. Additional architectural articulation is offered by inset brick panels and brick banding details at high level. Reveals to window and door openings will offer additional interest and brise soleil or shading features are shown on higher level windows to the southern, longer elevation. The main entrance to the building will be created on the eastern façade where a main door and canopy will be created and multi storey glazing provided.



This aspect will be visible primarily from within the school itself and less open to wider public views. The protruding canopy is a contemporary feature and acceptable in context. The stepped façade will offer some solar shading to this galleried space which appears to comprise an open foyer and staircase.

- 7.11 The wrap around glazing shown as serving the activity or drama studio is located at high level and by reason of orientation will flood this space with natural day and sunlight for most of the school day. Existing landscaping along the southern boundary will help diffuse direct sunlight along with a projecting feature around the opening to offer shade. Use of coloured glazing may also be considered and additional details will be required via condition to secure clear details of bricks, canopy materials, glazing and frame details including colour although it is understood window frames are likely to be black/anthracite. A darker brick plinth has also been discussed and would be supported by officers to break up elevations

and offer a “base” to the building up to ground floor cill level. The applicants are agreeable to this approach albeit this plinth detail is not shown on the submitted plans.

- 7.12 The proposed building will introduce a modern education space for physical education, sport and general wellness activities. The works as a whole will significantly improve site legibility, linking new spaces to existing buildings and enhancing clarity for visitors to the school as the main reception is currently hidden and difficult to locate. These are notable merits of the scheme and are afforded substantial weight. The building will utilise robust materials sympathetic to the context and the building will utilise space within the school grounds that arises from demolition of under utilised or poor quality buildings. It will create a more legible reception and entrance area to the wider school and maintain established landscape borders, notably along the southern boundary. Its massing, scale, design and location are acceptable. Policy GP6 Quality of Design, of the LDP is met.

7.13 Impact upon existing trees and hedgerows

Trees on this site and its boundaries are significant contributors to visual amenity in this urban fringe location close to the Conservation Area and Special Landscape Area and Scheduled Ancient Monuments. Removal of trees has several negative impacts over and above visual effects including upon air quality, reduction of valuable solar shading and felling can give rise to archaeological concerns due to ground heave. A Green Infrastructure statement has been provided in support of the application along with an Arboricultural Impact Assessment and associated tree protection and landscape drawings. This confirms that the school site has 44 individual trees, 13 groups of trees and one hedge. Four small existing trees conflict with the design proposal's build area and will need to be removed. The quality of these trees has been impeded by soil compaction and limited root area due to the school's car parking arrangement and their removal is proposed to be offset by the introduction of trees on the southern boundary and planters in the new courtyard area created.

- 7.14 The site context includes substantial green infrastructure as is surrounded by the school sports pitches, Caerleon Golf Course and the River Usk floodplain to the southwest, south and southeast. These comprise a mosaic of grassland and woodland habitats intersected with ponds, scattered trees, hedgerows and riverine habitats. The northwest, north and northeast of the site is a cemetery, allotments, playing field, bowling green and amenity greenspace associated with a roman barracks.

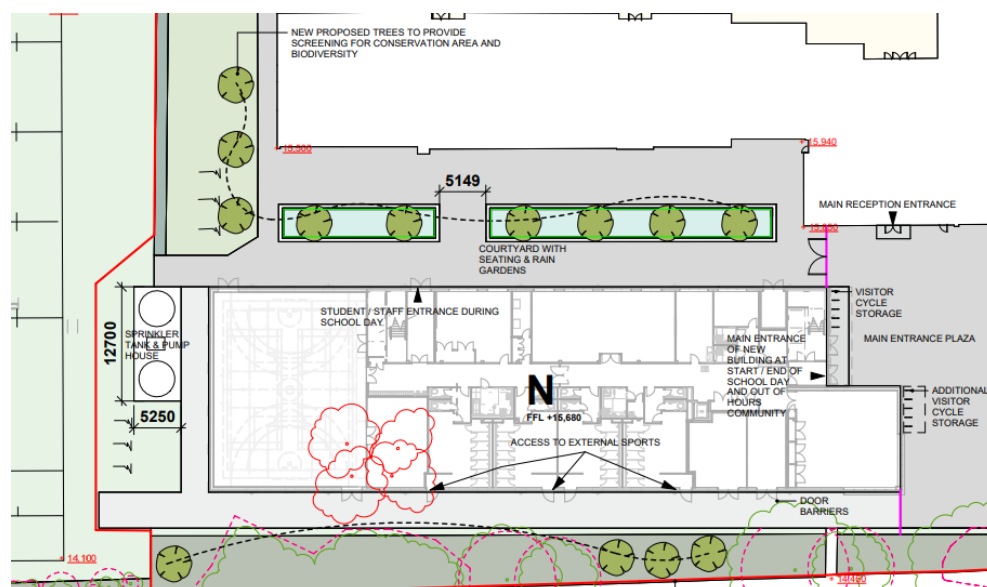
- 7.15 The southern boundary is notable as has a clear line of established landscape features that benefit the site and separate the built school from the rugby fields to the south. The proposed new building will not project closer to this existing landscape belt than current hardsurfacing used for parking and this belt of trees is proposed to be retained. Notwithstanding, activity required in connection with the new building will be in close proximity to several trees in this group and caution will be required during the construction phase. The tree survey categorises most specimens within it as category B quality. Whilst four smaller trees require removal, these are set within small green spaces within the wider hardsurfaced area rather than the main belt of trees along the site boundary. They are clearly very constrained and impeded at present by reason of their situation and their removal is acceptable. Similarly the proposed parking area in the south eastern corner has a comparable relationship to this southern landscaped border as the existing buildings and hardsurfacing that currently exist on site. To the north where there is a sizeable belt of trees that separates the site from the cemetery, these will be retained. The tree survey identified 3no. trees that require felling as they are dead or have Ash die-back but all of these are located in landscaped borders outside the application site but within the wider school grounds and are not impacted by the proposed development and vice versa. The Green Infrastructure Statement provided identifies a range of new landscape features within the application area and supported by the NCC Landscape Officer, summarised as follows:

To mitigate for the loss of the four trees, 13 newly planted trees will be planted within the retained and created grassland area and in the rain gardens. It is recommended that the newly planted trees of native of local provenance.

7.6 To mitigate for the loss of the ornamental hedgerows, a new native hedgerow will be planted along the southwestern boundary of the site. The hedgerow will be managed and

maintained to ensure it benefits wildlife, such as ensuring good basal growth, good height and width and cutting to avoid key ecological windows such as at nesting birds (March to September) and tree fruiting (March to November). It is recommended that the hedgerow is managed between February and March.

7.7 To mitigate for the loss of the amenity grassland, the retained grassland will be made good where necessary and new grassland will be created. The created grassland and restoration of the existing habitat will be sown with a suitable seed mix such as Emorsgate EM10 Tussocky Mixture.



Extract taken from drawing CCS-HLM-00-00-DR-L-00007P14



Photo provided in support of application, taken from rugby pitch and showing southern boundary with proposed building superimposed.

- 7.16 Some incursion to root protection areas appears to take place in a few areas but these incursions do not appear to be demonstrably harmful having regard to the current layout and existing situation. That said, caution will need to be applied in these areas to avoid tree damage and the Arboricultural Impact Assessment makes this point. Planning Policy Wales, Part 6 encourages multi functional outcomes and demonstration of the step-wise approach in biodiversity in all applications and the supporting information in this case is considered to adequately detail the impact of development upon landscape features (biodiversity matters are considered further below) with the principle outcome being avoidance and where small scale removal of tree features is necessary, this is compensated for by new planting. Allied to this, the development would achieve significant and clearly defined public benefits as required (PPW 6.4.42). This approach supports

resilient ecological networks in addition to wider visual amenity benefits, air quality benefits and solar shading potential.

7.17 Impact upon biodiversity interests

The NCC Ecologist comments are noted and in part relate to demolition works that are already consented. A bat survey has been provided in support of this application as set out in two reports, the Bat Emergence Survey report dated 5th December 2024, and the Green Infrastructure Assessment from November 2025. However, impact on bats arises from the demolition works already consented rather than the proposals subject of this full application.

7.18 It has been confirmed previously and as part of the prior approval for demolition that bats were detected in building K in the 2024 emergence survey, and in buildings K and D1 of this site during a site visit in October 2025 to inform the GI Statement. As a result of these surveys. It has already been accepted that the survey results represents a low-risk case in accordance with the NRW Approach to Bats and Planning Good Practice Guide 2015 and NRW confirmed their agreement of this in their letter of 12th January 2026 in response to the prior approval for demolition submission 25/1033. This view is re-iterated in NRW comments on this application.

7.19 The 2024 emergence survey report recommends compensation for loss of bat roost in building K in the form of 4 No. Beaumaris Woodstone Bat Boxes or similar. However the 2025 GI Statement survey detected two bat roosts but also recommended that four integrated bat boxes are included within the new buildings. The rationale is that two boxes are compensation for the two roosts lost to demolition, and the other two boxes represent a biodiversity enhancement. These boxes are provided and shown on submitted drawings.

7.20 The provision of four bat boxes is adequate compensation and enhancement for the loss of two very small roosts of relatively common bat species. These boxes are located on the south east elevation of new buildings at a height of no less than 3m. As recommended in the Bat Emergence Survey report, these should consist of 4 No. Beaumaris Woodstone Bat Box or similar specification such as Schwegler 1FF and this can be controlled by planning condition. In fact, all of the mitigation measures as set out in section 6 of the Bat Emergence Survey report and section 7 of the GI Statement can be secured by planning condition. NRW has raised concerns regarding the CEMP(V4) and consequently requires a CEMP condition to ensure this document is suitably updated in accordance with NRW recommendations.

7.21 The nearest watercourse which flows directly into the River Usk is about 350m to the northwest. It is considered unlikely that any dust, waste, materials, surface-water run-off, contamination or mobilised ground contaminants arising from construction will be able to migrate to this watercourse over this distance. Migratory fish are features of the River Usk SAC and these are sensitive to disturbance caused by vibration during construction. However disturbance effects only occur within less than 30 metres of the river, and the proposed development is very much further from the River Usk than 30m.

7.22 Otters are also a feature of the River Usk SAC, but the site of the proposed construction is already developed land, and does not support any habitats that otters could use for breeding or resting. There are formal hedges and tree-lines nearby, but these do not connect the River Usk with any other suitable otter habitats, so disturbance during construction is unlikely.

7.23 Therefore officers consider that the proposed project is not likely to have a significant effect, either alone or in combination with any other developments, upon the features of the River Usk Special Area of Conservation or any other site in the National Sites Network. This being the case, the Local Planning Authority does not need to undertake an 'Appropriate Assessment'. Section 4.4.1 of the GI Statement agrees that due to the scope of the works, the River Usk and connecting habitats will not be impacted by the proposals.

The CEMP condition proposed by NRW includes generic measures to avoid contamination of the natural environment during construction, and should be added to any decision. However, applying this planning condition is not essential to the conclusion of no likely

significant effect upon the River Usk SAC.

As the new build proposal will not harm a European Protected Species (and demolition works have been considered separately and consented), the LPA does need to address its mind to the three derogation tests when deciding whether to grant planning permission for this development. However, the tests undertaken as part of the demolition consenting process are duplicated below for completeness. A LPA failing to undertake such tests would be in breach of Regulation 3(4) of the 1994 Habitats Regulations which requires all public bodies to have regard to the requirements of the Habitats Directive in the exercise of their functions. In this case, officers are satisfied such tests are not relevant to the proposals forming part of this application and in all other respects, biodiversity interests are considered and the impact of development is acceptable. This accords with policy SP9 of the adopted LDP.

[For reference only, derogation tests undertaken as part of consideration of application reference 25/1033 are recited below:

(1) there are no satisfactory alternatives to the proposal.

The buildings are at end of life and in very poor condition. The Council has taken the view that to continue providing acceptable education provision from the site, a new build alternative is necessary. Whilst, short term repairs are, strictly speaking, an alternative, such short term repairs are likely to have already occurred over the lifespan of these buildings and in any case, would in themselves potentially impact EPS matters. In this case, in order to provide acceptable education accommodation on this existing school site, the demolition of these buildings is necessary and no satisfactory alternatives exist.

(2) the proposal is for imperative reasons of overriding public interest.

The school is required to provide an acceptable standard of school accommodation and education service. The buildings proposed for demolition have been recognised as falling short of these expectations and their demolition is necessary to achieve an acceptable replacement building arrangement. The proposed restoration of the site which includes the new school building and associated works, will serve the public interest and both maintain and enhance the standard of school accommodation on this site. There are approximately 1,500 pupils on the school roll. There are some 150 members of staff, including 88 teaching staff, 26 teaching assistants and support staff. This test is considered to be met.

(3) the derogation is not detrimental to maintaining a favourable conservation status for the bat population.

In terms of the favourable conservation status test, this is a low-risk case with a suitable bat survey report and appropriate mitigation proposed. As the notification is accompanied by the information that confirms both survey and appropriate mitigation, this test is met and the applicant is bound by such information in the exercise of any permitted development rights.]

7.24 Impact upon highway safety, parking and active travel

There isn't a PROW that is directly impacted by the proposal, however there is a PROW that runs near to the site (389/4/1). This runs alongside the eastern boundary adjacent to the football field. Active travel routes run along a similar route to the PROW and along the unnamed lane that runs from Coldbath Road to the secondary access of the school.

- 7.25** The proposal will utilise the existing main access off Cold bath Road and the secondary access to the north of the site close to the cemetery entrance. Whilst the proposals will not increase the number of pupils and staff at the site, the proposed parking arrangement will increase the number of spaces being accessed through the secondary access point. The section of highway which links this access to Cold Bath road is narrow, unlit and has no dedicated footway. This section of highway also forms part of an active travel route and any increase in vehicle movements along this section of road will increase the likelihood of conflict between multi modal users so requires mitigation. During officer site visits, vehicles appear to use part of the highway for parking and further narrowing its width. It is also used by cemetery, sports club and allotment users.



Google maps

- 7.26 The PROW route does not benefit from a hard surface and therefore it would not be suitable in inclement weather. The Highways Officer has suggested that the PROW/active travel route is upgraded and hard paved so that the section of road subject to an increase in traffic can be circumnavigated by cyclists and pedestrians. Officer site visits have confirmed the limitation of the PROW in its current form. The applicant has confirmed that discussions are already underway relating to improving this route by way of upgrading its surface and making it more usable. Such discussions with relevant parties is welcomed and as the Council has control over this matter, there appears to be a reasonable prospect of these improvements being achieved and implemented in practice thereby making a condition possible in this case to ensure such works are undertaken. A Grampian condition can prevent certain approved works on site until specified off site works are completed and where there is a reasonable prospect of completion. In this case, upgrade of the PROW/active travel route is reasonably necessary to mitigate harm arising from increased traffic using the lane and potential conflict arising with other users on cycle or foot in particular. A Grampian condition would be robust in this case.

The site and local area has constraints and consequently any upgrade must be sensitive to this. It is understood that to date, improvements to the existing Public Right of Way, are supported by other relevant service areas in the Council as such works would be positive for the local area and clearly delineate the path for users.

- 7.27 At present, the PROW is identified on NCC GIS mapping and only marked-out by worn tread markings identifying the desire line. The route appears logical so does not appear to require diversion, the issue is one of usability by reason of poor surfacing at present and limitations of use arising from drainage matters which often flood parts of the route or make it too boggy to be attractive to users. The PROW is 2.0m wide approximately and 150m long. To minimise visual, drainage and ground disturbance impacts discussions to date have suggested an unbound, free draining hoggin path with timber edging and this would clearly be an upgrade on the existing poor situation. However, any condition will need to secure final details and LPA approval of these prior to implementation.
- 7.28 The NCC Highways Officer has confirmed that impact upon the capacity of the local highway network is not of concern given that the number of pupils and staff will not be increasing. As the proposal will involve construction on an active school site, a Construction Environmental Management Plan has been submitted in support of the application and the Highways Officer has confirmed this document is acceptable. It sets out construction worker parking, construction compound - including provision for delivery vehicles to turn and therefore access and egress the highway in a forward gear, delivery/construction vehicle management plan – to ensure that there is no conflict between construction traffic and vehicles associated with the drop and off and collection of children, wheel wash facilities and dust suppression measures.

- 7.29 There are clear benefits associated with the reconfiguration on site and additional off road parking facilities to serve the school so that it more closely aligns with the adopted Parking SPG. A condition to secure the upgrade of the existing PROW can be mitigation for adverse effects noted by the Highways Officer in relation to the increased usage of the section of highway leading to the northern parking area and associated conflict concerns.

Harm can be reduced by removing other road users from the carriageway thereby reducing opportunity for conflict. It would also adapt and upgrade an existing Active Travel Route. It offers a shorter route to the wider residential area north of the railway line and traverses the western boundary of the football field. Upgrading the PROW facilitates its use by more people and without the issues that affect it for some parts of the year. This benefit is greater than the school itself as has wider community advantages. The scheme accords with policy GP4 of the LDP.

7.30 Impact upon heritage considerations including archaeology

Whilst not within the Conservation Area, the proposals will impact views into and out of it and this will be a material consideration. The Principal Heritage Officer raises no objection subject to condition requiring further details about finishes and reveals for example which would be attached to any grant of consent. In archaeological terms, information has been submitted in support of this application and considered by both CADW (Scheduled Ancient Monuments) and HENEB. Cadw has confirmed that it concurs with the conclusion that the proposal will have a neutral impact upon the heritage assets it cares for. HENEB comments pre-date Cadw's final comments on this proposal but the Archaeological Field Evaluation accompanying this submission makes clear that further measures are necessary during construction:

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

A condition to secure such mitigation is necessary.

7.31 Flood risk, Air Quality and Residential amenity

The area proposed to be developed is not located within a flood risk zone based on the Flood maps for planning but a small area close to the access off Coldbath Road falls within a zone 2 surface water flood risk area. This is an existing situation and the area will remain as an access and parking area as per existing. A Flood Consequences Assessment has been submitted and confirms that the site is generally at low risk of flooding from Fluvial, Pluvial and Sea Flooding and negligible risk of flooding from Canal Failure, Groundwater & Sewer flooding. As a result of the development proposals, flood risk is mitigated by the inclusion of an extensive Sustainable Drainage system which better the predevelopment brownfield rate. Existing surface drainage on the site is complex and in poor condition, in places. Surface water drainage from the development site will be intercepted by proposed SuDS features and discharge at a restricted rate to a private sewer to the south of the site, before re-entering into the surface water network. The proposed new building is protected and the approval of the Sustainable Drainage Approving Body (SAB) is necessary for this scheme in relation to surface water drainage proposals. Separate SAB approval is not necessary, we understand, for the works to upgrade the PROW.

The site is not located within an Air Quality Management Area but will require access via an AQMA and associated buffer. However, as the proposal does not increase school capacity, officers have no concerns in this regard. Any increased traffic outside school hours will likely be in off peak traffic periods when congestion can reasonably be expected to be significantly less. Existing Active Travel Routes close to the site afford alternative routes into school by visitors and students including those resident north of the railway bridge and may reduce car traffic using the one way system to drop off for example. At present, there is no drop off facility for the school and no turning area at the school gates.

- 7.32 Impact upon residential amenity is limited by reason of the distance from nearest residential receptors. During construction, additional construction vehicles will be observed in the area

but the CEMP will manage such activities for the duration of the construction period. Policy GP2 of the LDP is met.

- 7.33 The development is compatible with safeguarding sand and gravel resources as is located within the school confines on areas that are already developed. Policies SP21 and M1 is complied with.

8. OTHER CONSIDERATIONS

8.1 *Crime and Disorder Act 1998*

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the proposed decision.

8.2 *Equality Act 2010*

The Equality Act 2010 identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership.

- 8.3 Having due regard to advancing equality involves:

- removing or minimising disadvantages suffered by people due to their protected characteristics;
- taking steps to meet the needs of people from protected groups where these differ from the need of other people; and
- encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

A Socio-economic Duty is also set out in the Equality Act 2010 which includes a requirement, when making strategic decisions, to pay due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage.

- 8.4 The above duties have been given due consideration in the determination of this application. It is considered that there would be no significant or unacceptable impact upon persons who share a protected characteristic, over and above any other person, as a result of the proposed decision. There would also be no negative effects which would impact on inequalities of outcome which arise as a result of socio-economic disadvantage.

8.5 *Planning (Wales) Act 2015 (Welsh language)*

Section 31 of the Act clarifies that impacts on the Welsh language may be a consideration when taking decisions on applications for planning permission so far as it is material to the application. This duty has been given due consideration in the determination of this application. It is considered that there would be no material effect upon the use of the Welsh language in Newport as a result of the proposed decision.

8.6 *Newport's Well-Being Plan 2018-23*

The Wellbeing of Future Generations (Wales) Act 2015 imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principle to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. This duty has been considered during the preparation of Newport's Well-Being Plan 2018-23, which was signed off on 1 May 2018. The duty imposed by the Act together with the goals and objectives of Newport's Well-Being Plan 2018-23 have been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable impact upon the achievement of wellbeing objectives as a result of the proposed decision.

9. CONCLUSION

- 9.1 The proposal is of significant benefit to the operation of the existing school. It will afford staff and students enhanced sporting and educational spaces and also bring community

benefits. Its design is considered compatible with the site and locality. The rationalisation of buildings and enhancement of on site parking will make the school more legible and reduce the need for overspill parking on the nearby lane and verges. The new building and associated works will preserve the setting of the local Scheduled Ancient Monuments and Caerleon Conservation Area, will retain local landscape features, are compatible with the Special Landscape Area and include biodiversity enhancement.

- 9.2 The merits of the scheme are afforded substantial weight and officers recommend permission is granted subject to conditions.

10. RECOMMENDATION

GRANTED WITH CONDITIONS

- 01 The development shall be implemented in accordance with the following plans and documents:

- CB2183-CAM-XX-XX-DR-C-0204-S2-P01_Vehicle Tracking (Low Loader)
- CB2183-CAM-XX-XX-DR-C-0203-S2-P02_Vehicle Tracking (Rigid Lorry)
- CCS-HLM-NN-ZZ-DR-A-00202-P03 - New Block - Sections - Sheet 2
- CCS-HLM-NN-ZZ-DR-A-00201-P03 - New Block - Sections - Sheet 1
- CCS-HLM-NN-XX-DR-A-00300-P03 - New Block – Elevation
- CCS-HLM-NN-R1-DR-A-00131-P03 - New Block - Roof Plan
- CCS-HLM-NN-00-DR-A-00111-P03 - New Block - Ground Floor Plan
- CCS-HLM-00-00-DR-A-00002-P04 - Proposed Site Block Plan
- CCS-HLM-00-00-DR-L-00007- P14 - Landscape Plan GA
- CCS-HLM-00-00-DR-A-00000-P03-Red Line Boundary
- 24-043 Caerleon Comprehensive TCP-Layout1
- CB2183-CAM-XX-XX-DR-C-0613-S4-P02 - Proposed Site Levels & Contour Sheet 3
- CB2183-CAM-XX-XX-DR-C-0612-S4-P02 - Proposed Site Levels & Contour Sheet 2
- CB2183-CAM-XX-XX-DR-C-0611-S4-P02 - Proposed Site Levels & Contour Sheet 1
- CB2183-CAM-XX-XX-DR-C-0610-S4-P02 - Proposed Site Levels & Contour Overview
- CB2183-CAM-XX-XX-DR-C-0507-S2-P01 - Proposed Foul Drainage (Sheet 2 of 2)
- CB2183-CAM-XX-XX-DR-C-0506-S2-P01 - Proposed Foul Drainage (Sheet 1 of 2)
- CB2183-CAM-XX-XX-DR-C-0505-S2-P01 - Proposed Foul Drainage Overview
- CB2183-CAM-XX-XX-DR-C-0504-S4-P02 - Proposed Surface Water Drainage Sheet 3
- CB2183-CAM-XX-XX-DR-C-0503-S4-P02 - Proposed Surface Water Drainage Sheet 2
- CB2183-CAM-XX-XX-DR-C-0502-S4-P02 - Proposed Surface Water Drainage Sheet 1
- CB2183-CAM-XX-XX-DR-C-0501-S4-P02 -Proposed Surface Water Drainage Overview
- CB2183-CAM-XX-XX-DR-C-0500-S4-P02 - Proposed Drainage Overview
- CB2183 CAM XX ZZ DR C 0201 P2 - Vehicle Tracking Fire Appliance Sheet 2
- CB2183 CAM XX ZZ DR C 0200 P2 - Vehicle Tracking Fire Appliance Sheet 1
- CCS-HLM-NN-01-DR-A-00121 - New Block - First Floor Plan-P03
- Heritage Impact Assessment by Kew Planning February 2026
- Caerleon Comprehensive School Construction Environmental Management Plan (CEMP) Main Works Rev 4 27/1/26
- Preliminary Ecological Appraisal Report by Ecology Wales 19/6/24
- Bat Emergence Survey Report by Ecology Wales 5/12/24
- Green Infrastructure Assessment by Ethos Environmental Planning November 2025
- Planning Statement by Kew Planning November 2025
- Archaeological Field Evaluation by GGAT January 2012
- Tree Survey, Categorisation and Constraints Report by Arboricultural Associates

June 2024

- Arboricultural Implications Assessment and Arboricultural Method Statement combined by Arboricultural Associates October 2025
- Transport Statement P02 by Cambria
- Flood Risk Assessment S2-P01 by Cambria
- Drainage Statement for Planning CB2183-CAM-ZZ-XX-LT-C-0001-S2-P01 by Cambria

Reason: In the interests of clarity and to ensure the development complies with the submitted plans and documents on which this decision was based

Pre- commencement conditions

- 02 Notwithstanding the CEMP (revision 4) provided, no development shall take place, including any works of site clearance, until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:
- Construction methods: details of materials, how waste generated will be managed.
 - General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
 - Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
 - Soil Management: details of topsoil strip, storage and amelioration for re-use.
 - CEMP Masterplan: details of the extent and phasing of development.
 - Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use.
 - Traffic Management: details of site deliveries, plant on site, wheel wash facilities,
 - Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
 - Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact detail.
- The CEMP shall be implemented as approved during the site preparation and construction phases of the development.
- Reason: To ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the River Usk SAC/SSSI and wider environment during construction.
- 03 Notwithstanding the information submitted, no ground disturbing works of development or site clearance shall take place until the local planning authority has been informed in writing of the name of a professionally qualified archaeologist who is to be present during the undertaking of any excavations in the development areas so that a watching brief can be conducted. No work shall commence until the local planning authority has confirmed in writing that the proposed archaeologist is suitable. A copy of the watching brief report shall be submitted to the Local Planning Authority within two months of the fieldwork being completed by the archaeologist.
- Reason: To safeguard valuable heritage features on site in accordance with policy SP9 of the adopted LDP.
- 04 No development shall commence until a foul water drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul water flows and thereafter implemented in accordance with the approved details prior to the occupation of the development.
- Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.
- 05 No development shall commence until a scheme for upgrading Public Right of Way 389/4/1 for its length between the main and secondary access points to the school and including a

timetable for completion of the upgrade works, has been submitted to and approved in writing by the Local Planning Authority. The works shall thereafter be undertaken in accordance with the approved details prior to occupation of the development.

Reason: To mitigate harm associated with increased vehicular usage of the lane and associated potential increase in conflict with multi nodal users. Policy GP4 of the LDP.

- 06 Notwithstanding the details provided, no development shall take place until a detailed Arboricultural Method Statement (AMS), consistent with BS 5837:2012 has been submitted to and approved in writing by the Local Planning Authority. This must include –
- design and implementation of new hard surface and buildings within the root protection area of retained trees,
 - services design and installation requirements and how this impacts retained and proposed trees,
 - Arboricultural site monitoring and supervision to include details of the appointed arboriculturalist that will undertake the monitoring and supervision works.

The development shall thereafter be carried out strictly in accordance with the approved AMS. The detailed AMS will include committal language of will, must and shall in reference to all operations which could impact retained trees.

Reason: To ensure construction works do not harm retained trees in accordance with Policy GP5 of the LDP.

- 07 No development shall commence until tree protection fencing has been installed in accordance with the Tree Protection Plan 24-043 hereby approved. Such fencing shall be retained for the duration of construction activities. Nothing shall be stored or placed within any fenced area, and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the prior written consent of the Local Planning Authority.

Reason: To safeguard valuable landscape and tree features in the interests of biodiversity and general amenity. Policy GP2, SP8, GP6, SP9 of the LDP.

Pre – construction conditions

- 08 Prior to their installation/construction, full details of the sprinkler tank(s) and other supporting infrastructure located outside the new building but associated with it such as air source heat pumps or any other plant/plant buildings, shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details and retained as approved for lifetime of development.

Reason: To ensure that the development is completed in a manner compatible with its surroundings in accordance with Policies SP8, GP2 and GP6 of the NLDP.

- 09 Prior to the commencement of construction work, and notwithstanding details submitted to date, full details of proposed landscape species, locations, size at planting, density, and an outline planting and maintenance plan shall be submitted to and approved in writing by the Local Planning Authority. Such a scheme shall have regard to, and be compatible with, the approved Green Infrastructure Statement and shall also include details of soil fill for the raingardens that is compatible with tree health and longevity. The approved scheme of landscaping and tree planting shall be carried out in its entirety by a date not later than the end of the full planting season immediately following the occupation of the development. Thereafter the trees and shrubs shall be maintained in accordance with the approved maintenance plan and unless otherwise specified, any which die or are damaged shall be replaced and maintained until satisfactorily established. For the purpose of this condition, a full planting season shall mean the period from October to April.

Reason: To secure the satisfactory implementation of the proposal in accordance with policies GP5 and SP9 of the LDP and PPW12.

- 10 No construction work shall be commenced until full sectional details at 1:20 scale or similar and construction drawings to confirm brick recess detailing, eaves detail and window reveals along with projecting integrated window shading features and a sample board of materials and finishes to be used on the external surfaces, have been submitted to and approved in writing by the Local Planning Authority. The details shall also include sectional and finishing details of the casement windows and glazed feature panels and main entrance canopy. The development shall be undertaken in accordance with the approved materials/ details and retained for lifetime of development.

Reason: To ensure that the development is completed in a manner compatible with its surroundings in accordance with Policies SP8, GP2, SP5, SP9 and GP6 of the NLDP.

Pre –occupation conditions

- 11 Prior to the first beneficial use of the new building hereby approved, a minimum of 13no. electrical vehicle charging points shall be installed on site and available for use. They shall be maintained and retained for lifetime of development.
Reason: In accordance with policies SP1 and GP4 of the NLDP.
- 12 Prior to first beneficial use of the new building hereby approved, the reconfigured and new parking areas including cycle parking provision hereby approved shall have been completed and available for use. These areas shall thereafter be kept clear of obstruction to enable their intended use. Reason: To ensure off road parking and cycle parking is provided and retained in accordance with approved plans in the interests of highway safety, sustainability and general amenity. SP1 and GP4 of the NLDP and SPG on Parking.
- 13 Prior to first beneficial use of the new building hereby approved 4 No. integrated Beaumaris Woodstone Bat Boxes (or similar specification such as Schwegler 1FF) and integrated Swift bricks (x4), shall be installed on the south east elevation (bat boxes) and south west elevation (Swift bricks) of the approved building at a height of no less than 3m, just under the eaves. These boxes and bricks shall be retained for lifetime of development.
Reason: In accordance with PPW12, policy SP9 of the LDP and having regard to the section 6 duty of the Environmental (Wales) Act.

General conditions

- 14 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.
Reason: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.
- 15 No external lighting shall be installed on site unless full details have first been submitted to and approved in writing by the Local Planning Authority. All details must avoid light spill into sensitive areas and those areas of value to bats and other species. Any external lighting shall thereafter be installed in accordance with the approved details and retained as such for lifetime of development.
Reason: To safeguard ecological interests in accordance with Policies GP5 and SP9 of the LDP and PPW12.
- 16 No fencing or other means of boundary enclosure shall be installed on site unless full details have first been submitted to and approved in writing by the Local Planning Authority. Any means of enclosure shall thereafter be installed in accordance with the approved details and retained as such for lifetime of development.
Reason: To safeguard amenity and landscape in accordance with Policies GP2, SP9, GP5 and GP6 of the LDP and PPW12.

NOTE TO APPLICANT

01 This decision relates to plan Nos:

- CCS-HLM-AA-XX-DR-A-00301-P01 - Existing Block A - Main Building
- CCS-HLM-AA-00-DR-A-00101- P09 - Existing Block A - Ground Floor Plan
- CCS-HLM-00-00-DR-L-00008-P08 - Existing Site Plan
- CCS-HLM-00-00-DR-A-00001-P05- Existing Site Block Plan
- 24-043 - Topographical Survey
- Design and Access Statement Parts 1 & 2 revision P05 by HLM Architects (26/11/25)

- Pre Application Consultation Report by Kew Planning February 2026
- Travel Plan P01 by Cambria
- Covering letter by Kew Planning 27/11/25

02 The development plan for Newport is the Newport Local Development Plan 2011 – 2026 (Adopted January 2015). The following policies were relevant to the determination of this application:

- SP1 Sustainability
- SP2 Health
- SP3 Flood Risk
- SP8 Special Landscape Areas
- SP9 Conservation of the Natural, Historic and Built Environment
- SP12 Community Facilities
- SP14 Transport Proposals
- SP18 Urban Regeneration
- GP1 Climate Change
- GP2 General Amenity
- GP4 Highways and Accessibility
- GP5 Natural Environment
- GP6 Quality of Design
- GP7 Environmental Protection and Public Health
- SP4 Water Resources
- SP9 Conservation of the Natural, Historic and Built Environment
- T4 Parking
- W3 Provision for Waste Management Facilities in Development
- CE3 Environmental Spaces and Corridors
- M1 Safeguarding of Mineral resource

The proposed development (including any demolition) has been screened under the Environmental Impact Assessment Regulations and it is considered that an Environmental Statement is not required.

The Applicant is reminded to avoid disturbance to nesting birds which are protected under the Wildlife and Countryside Act 1981: Part 1, 1(1)(b), whereby it is an offence to intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built.