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Caerleon Comprehensive School

Planning Statement

June 2025

Document Control Sheet

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Contents

1. Introduction	5
2. The Site and Surrounding Area.....	10
3. Planning History	14
4. Pre-application feedback	15
5. The Proposal	18
6. Planning Policy.....	23
7. Planning Considerations.....	26
8. Summary	32



1. Introduction

- 1.1 This Planning Statement (PS) has been prepared by KEW Planning, on behalf of Newport Norse, to support the proposal for the demolition of teaching blocks D1 (Learning Hub), D2 (Drama), D3G (WBQ), H (Gym), K (Conference) and L (Caretaker house) and the creation of new sports and teaching facilities at Caerleon Comprehensive School.
- 1.2 This PS provides an assessment of the proposed development against the provisions of the statutory Local Development Plan, Planning Policy Wales and other material planning considerations.
- 1.3 The site address is Caerleon Comprehensive School, Cold Bath Road, Caerleon, Newport NP18 1NF which falls within the administrative boundary of Newport City Council (NCC).

Figure 1: Site location Plan



Background

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

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

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

The Proposal

1.6 The description of the proposed development is as follows:

“Demolition of blocks D1 (Learning Hub), D2 (Drama), D3, G (WBQ), H (Gym), K (Conference) and L (Caretaker house), partial demolition and repurposing of blocks A/B/C (Main block) and creation of a new sports and teaching facilities.”

Purpose of the Statement

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

Application Documents

1.8 This application is accompanied by the following documents:

- CB2183-CAM-XX-XX-DR-C-0500-S4-P02_Proposed Drainage Overview
- CB2183-CAM-XX-XX-DR-C-0501-S4-P02_Proposed Surface Water Drainage Overview
- CB2183-CAM-XX-XX-DR-C-0502-S4-P02_Proposed Surface Water Drainage Sheet 1

- CB2183-CAM-XX-XX-DR-C-0503-S4-
P02_Proposed Surface Water Drainage Sheet 2
- CB2183-CAM-XX-XX-DR-C-0504-S4-
P02_Proposed Surface Water Drainage Sheet 3
- CB2183-CAM-XX-XX-DR-C-0505-S2-
P01_Proposed Foul Drainage Overview
- CB2183-CAM-XX-XX-DR-C-0506-S2-
P01_Proposed Foul Drainage (Sheet 1 of 2)
- CB2183-CAM-XX-XX-DR-C-0507-S2-
P01_Proposed Foul Drainage (Sheet 2 of 2)
- 24-043 Caerleon Comprehensive TCP-Layout1
- 24-043_Caerleon Comprehensive
School_BS5837 Tree Survey & TCP. June 2024
- Archaeological Field Evaluation
- Caerleon Comprehensive School, Bat
Emergence Survey Report ISSUED
- Caerleon Comprehensive School, PEA Report
ISSUED
- CB2183 CAM XX ZZ DR C 0200 P1 Vehicle
Tracking Fire Appliance Sheet 1
- CB2183 CAM XX ZZ DR C 0201 P1 Vehicle
Tracking Fire Appliance Sheet 2
- CB2183-CAM-ZZ-XX-RP-TR-0002-P01 Transport
Statement[17]
- CB2183-CAM-ZZ-XX-RP-TR-0003-P01 Travel
Plan[42]
- CB2183-CAM-ZZ-XX-TN-TR-0001 Transport Note
- CCS-HLM-00-00-DR-L-00008-Existing Site Plan -
P06
- CCS-HLM-00-DR-L-00007-Landscape GA Plan -
P09
- CCS-HLM-AA-00-DR-A-00101-Block A - Ground
Floor Plan - Existing-P09
- CCS-HLM-AA-XX-DR-A-00301-Block A - Main
Building - Elevations - Existing-P01
- CCS-HLM-NN-00-DR-A-00111-New Block -
Ground Floor Plan - P02
- CCS-HLM-NN-01-DR-A-00121-New Block - First
Floor Plan - P02
- CCS-HLM-NN-R1-DR-A-00131-New Block - Roof
Plan-P02
- CCS-HLM-NN-XX-DR-A-00300-New Block -
Elevations-P02
- CCS-HLM-NN-ZZ-DR-A-00201-New Block -
Sections - Sheet 1-P02

- CCS-HLM-NN-ZZ-DR-A-00202-New Block - Sections - Sheet 2-P02
- CCS-HLM-XX-XX-RP-A-00002-Caerleon Comprehensive School - Design and Access statement P03
- CCS-HLM-00-00-DR-A-00001-P05-Site Block Plan - Existing.pdf
- CCS-HLM-ZZ-00-DR-A-10101-P01-Demolition Plan

- **Section 7** – sets out the considerations for the proposal.
- **Section 8** – provides a summary and conclusion.

Planning Statement Structure

1.9 This PS is set out as follows:

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



2. The Site and Surrounding Area

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

The Site and the Surrounding

2.2 The school is located at the southern edge of the town of Caerleon, in the Caerleon Ward. The school site is accessible from Cold Bath Road and an unnamed road directly west of Caerleon AFC football pitch. Its west and north-west boundaries are defined by mature vegetation, whilst groups of trees and bushes define the eastern boundary. The site is roughly rectangular in shape and measures circa 5.2 ha.

2.3 The school consists of various buildings ranging from 1 to 3 storeys. The original buildings date back to the 1960's, with alterations and extensions added since. The gymnasium block and headteachers block were constructed in the early 1970's. A 2 storey teaching block was constructed in the early 2000's and a number of portacabins have been added to the site throughout the years.

2.4 The application site is bound to the north by the Caerleon Cemetery, the Cold Bath Road allotments and the Caerleon A.F.C football pitch.

2.5 The extensive Caerleon golf course bounds the site to the west and south. Further to the south, the River Usk forms a natural curving boundary to the golf course.

2.6 Caerleon Rugby club is located to the east of the site, whilst the Roman Barracks sit to the north-east of the site. This is a very important historical site, which forms part of the Caerleon Roman Civil Settlement.

2.7 Apart from the Caerleon Golf Course, the site's wider surrounding area is characterised to the north-west by the grounds of St Cadoc's Hospital, beyond the railway line, and to the north-east and east by 2 storey residential properties.

2.8 The town of Caerleon is split in two by the railway line, and has a predominantly residential character. It is centred around Goldcroft Common, and a small concentration of shops can be found at the intersection of the High Street and Mill Street, within walking distance from the application site.

2.9 Caerleon is the site of a Roman legionary fortress, Isca Augusta, and an Iron Age hillfort. Its great archaeological importance makes it a tourist destination and its key attractions are the Roman Amphitheatre, the National Roman Legion Museum, the Roman Fortress and Baths Museum, and the remains of the Roman Barracks including its fortress walls. As a result, the

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

Flood Risk Considerations

- 2.10 Figure 2 provides an extract of the Natural Resource Wales (NRW) Development Advice Map (Wales), confirming that the site falls within Flood Zone A, which are areas considered to be at little or no risk of fluvial or coastal/tidal flooding. Despite this figure 2 illustrates that the area directly south of the boundary is located within Flood Zone B.
- 2.11 Figure 3 provides an extract from the new Flood Map for Planning, showing that the majority of the site is not located within a Flood Zone whilst a very small hard surfaced area at the entrance to the site has been identified to be in Flood Zones 2/3. Similar to the DAM, FMFP also demonstrates that the area directly south of the boundary is located within Flood Zone (3).
- 2.12 Whilst it is acknowledged that the site is closely bound by areas at risk of flooding, this is mainly isolated to the existing playing fields, where no built form or changes are proposed. Areas of proposed development are confined to the existing built area of the school site.

Figure 2: NRW Development Advice Map

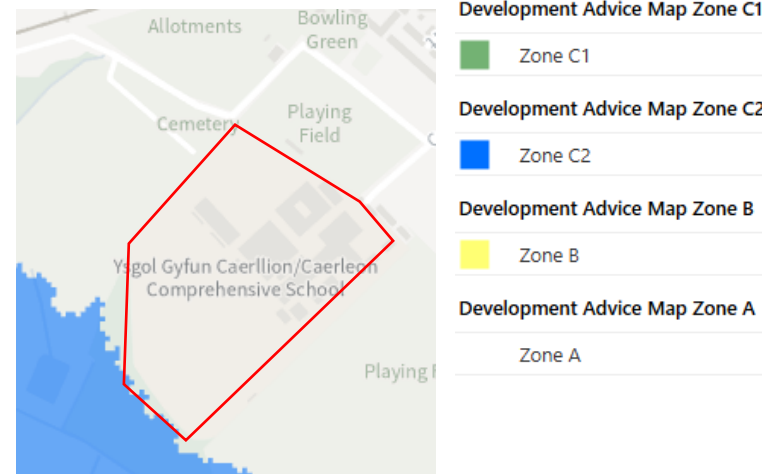
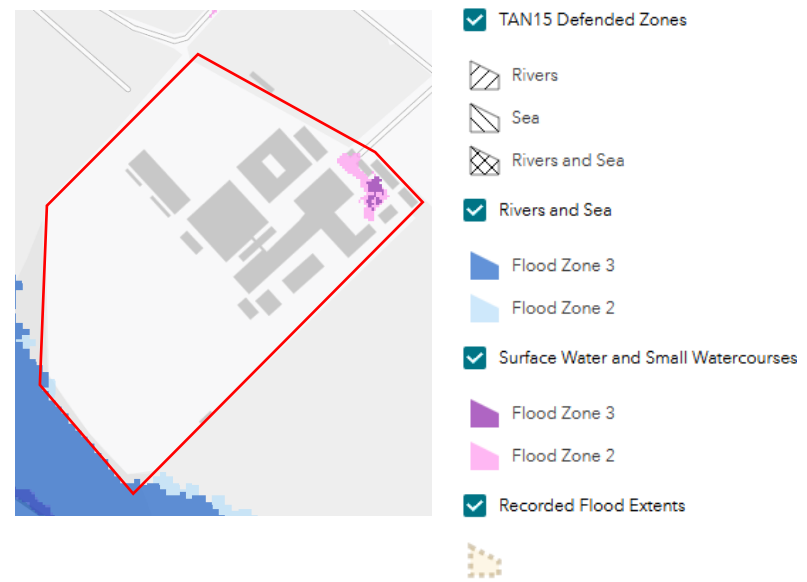


Figure 3: NRW Flood Map for Planning



Site Designations

Site designations

2.13 Figure 4 is an extract from the constraints and proposals map of Newport LDP, which shows the relevant designations of the site and its surroundings.

5.1 The school is located within the urban boundary of Caerleon. As illustrated in Figure 4, the application site is afforded the following designations:

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

5.2 Figure 4 also demonstrates the extent of designations in proximity to the site, which include:

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

Figure 4: Newport LDP Proposal and Constraints Map Extract – Surrounding Area



Caerleon Archaeologically Sensitive Area



Caerleon Conservation Area



Scheduled Ancient Monument



Countryside



River Usk Special Landscape Area



Area of Safeguarding of Mineral Resource

3. Planning History

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

Table 1 – Planning application records of the site

Reference	Description	Decision	Decision date
18/1123	Erection of weldmesh fence and gates up to 2.4 metres	Permitted	01/05/2019
18/0482	Replacement of 1no. pair of automated vehicular entrance gates and posts, installation of additional CCTV camera to pedestrian gate and installation of car reader intercom post	Permitted	10/08/2018
11/0571	Extension with pitched roof to existing standalone gymnasium and replacement of a window unit with a door in the headteacher's block	Permitted	02/02/2012
09/1158	Erection of external canopies for outdoor play	Permitted	13/01/2010
08/0945	Siting of portacabin	Permitted	21/08/2008
04/1402	Provision of cabin stacked on top of existing cabin which is to be relocated	Permitted	15/10/2004
04/1031	Provision of additional cabin to be stacked on top of existing cabin for use by Gwent Music support	Withdrawn	11/08/2004
03/1286	Erection of a two storey teaching block and relocation of tennis courts and associated drainage works	Permitted	03/12/2003
99/0360	Erection of a single storey infill building to provide 4 classrooms and a display area	Permitted	25/05/1999
97/0635	Siting of a demountable classroom	Permitted	06/08/1997
95/0413	Proposed siting of a double demountable classroom unit	Permitted	02/06/1995
93/0445	Proposed siting of a double demountable classroom unit	Permitted	16/06/1993
91/0222	Erection of single demountable classroom	Permitted	23/04/1991

4. Pre-application feedback

4.1 *Design, Massing & Location*

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

4.2 *Heritage & Landscape*

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

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

4.3 *Trees & Green Infrastructure*

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

4.4 *Ecology*

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

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

4.5 *Highways & Active Travel*

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

4.6 *Contamination*

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

4.7 *Flood Risk, Air Quality & Amenity*

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

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

4.8 *Conclusion*

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

4.9 *Requirements for full planning include:*

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



5. The Proposal

Overview

- 5.1 The proposal includes the demolition of blocks D1 (Learning Hub), D2 (Drama), D3, G (WBQ), H (Gym), K (Conference) and L (Caretaker house), partial demolition and repurposing of blocks A/B/C (Main block) and creation of a new sports and teaching facilities. The new building is proposed to be 2 storeys in height and is located adjacent to the south-eastern boundary of the school site.
- 5.2 Caerleon Comprehensive school's built form and learning spaces are dated. As a result, there is an urgent need to deliver a modern, fit for purpose, replacement learning block and sports facilities including upgrades to existing spaces in order to provide a new learning environment for students and a facility that the local community can use and benefit from.

Proposed spaces

Ground Floor

- 5.3 The ground floor is to house the main sports facilities and staff areas. This includes a double height sports hall, activity studio, fitness suite/weights room and a general classroom.

- 5.4 In addition to these spaces, the proposal also includes four main changing rooms, providing the opportunity for them be allocated to individual classes, teams, age groups, or designated as required. Alongside these, there is a hygiene room that is proposed to double as an assisted change place' for school and/or community use, whilst a second smaller accessible change/shower room is located near the entrance to the building. These accessible rooms are located separate from pupils and community teams for safeguarding and double as staff/referee/coach changing.
- 5.5 There will also be a first aid room, with en-suite accessible WC, which will also be utilised by the school as a 'sick bay/nurse base' and is large enough for a stretcher/trolley for the school and sports emergencies.

First Floor

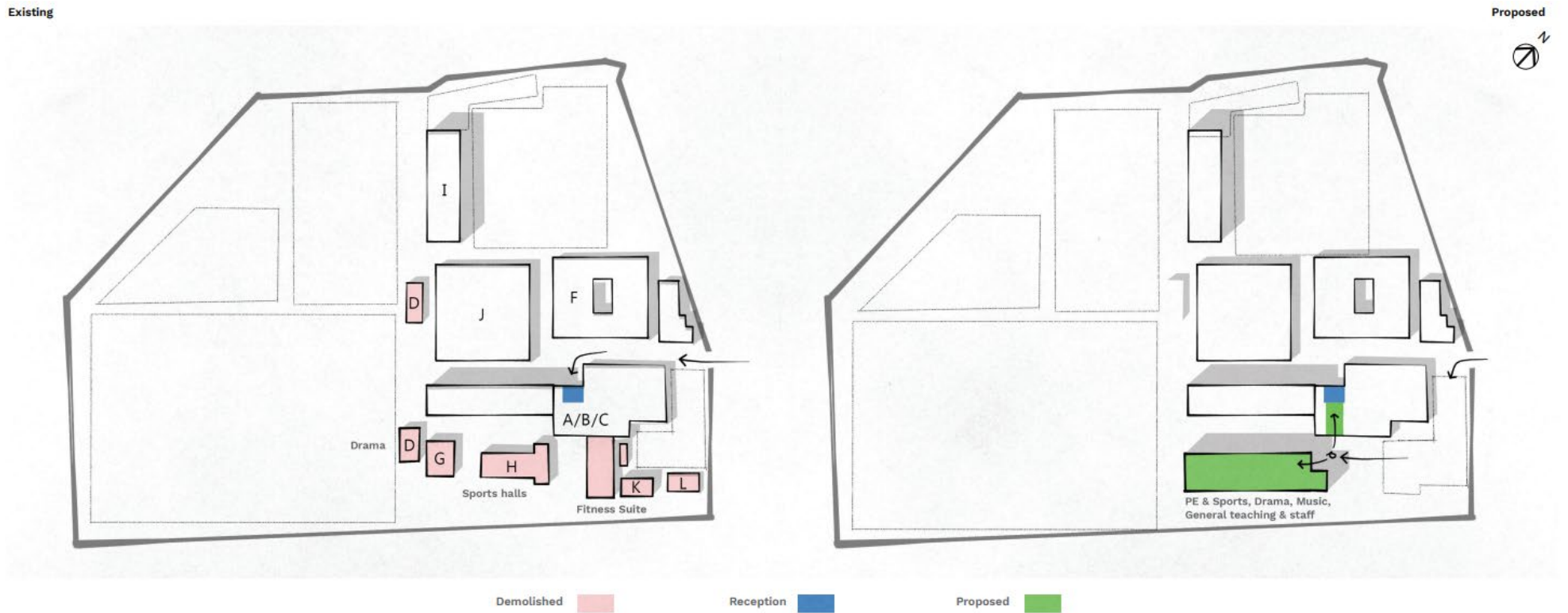
- 5.6 The first floor will house four general classrooms, and four specialist performing arts spaces (Drama/music). The northern drama studio overlooks the top of the activity studio offering an opportunity to use this space as a control room for larger performances.
- 5.7 Each music/drama space has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

rooms allowing it to be used for both, offering a good level of supervision.

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

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

Figure 5 – Proposed demolition



Design and Material Palette

- 5.10 The main built form of the proposed new learning space is two storeys, and in a rectangular shape, with large areas of repeating classroom windows allowing for natural daylight and ventilation.
- 5.11 The proposed entrance to the building is to be dual use for both the school and community (out of school hours). In compliance with Building Regulations M, the entrance to the building is to be visually recognisable and includes a glass feature wall and canopy. Adjacent to the entrance are bicycle stands, which help to identify the proposed access route.
- 5.12 The position of the new block parallel, to Block A (existing) allows for the creation of an improved courtyard area that acts as an external circulation and social space for pupils.
- 5.13 Aligning the buildings rhythm and creating balance, the proposal includes a corner window, which creates a focal point and provides views from the school bus stop area, whilst also offering natural daylight to the proposed activity studio. The design evolution of this feature can be seen in section 6 of the submitted DAS.
- 5.14 In terms of the proposed material palette section 6 of the submitted DAS sets out the design approach to the selection of the external finish of brick, which offers both consistency with

the existing built form of the school, as well as being durable and practical.

- 5.15 To create visual interest the proposal includes course capping, reveal emphasis, a solid plinth and faded mixed courses.

Figure 6: Proposed Elevations



Elevation 1



Elevation 2



Elevation 3



Elevation 4

Landscape Strategy

- 5.16 The existing social spaces around the site are mostly hard paved. This will continue into the new courtyard, promoting a usable space for pupils in all weathers, as well as providing maintenance and emergency vehicle access.
- 5.17 The Courtyard area is proposed to be broken up with rain gardens and planting, softening the feel of the area whilst also improving drainage. The soft informal areas make use of the level change between the buildings and pitches, creating spaces for sitting and socialising. The proposed MUGA has been sized so it does not hinder future proposals.
- 5.18 Further details of the proposed landscaping can be viewed on the Landscape Plan submitted as part of the application submission.

6. Planning Policy

6.1 This chapter summarises the national and local planning policy framework, that is relevant to the proposed development.

6.2 All development should be in accordance with the statutory development plan, unless material considerations indicate otherwise, as required by s36 of the Planning and Compulsory Purchase Act 2004. In this context, the statutory development plan for NCC comprises the Newport City Council Local Development Plan adopted in January 2015.

6.3 National planning guidance (Planning Policy Wales Edition 12 and Technical Advice Notes) are material considerations. Other material considerations which should be taken into account are local Supplementary Planning Guidance (SPGs).

National Planning Policy

6.4 Regard has been had to the Government's Planning Policy Wales framework (PPW) and to the relevant Technical Advice Notes (TAN):

- Planning Policy Wales Edition 12 2024
 - Paragraph 3.3 to 3.5 (Good Design Making Better Spaces)

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

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

Local Planning Policy

6.5 The following policies are considered relevant:

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

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

6.6 Other material considerations include:

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

Caerleon Comprehensive School Planning Statement – June 2025

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

7. Planning Considerations

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

Principle of development

7.2 Paragraph 1.18 sets out the objectives of Newport Local Development Plan (LDP) 2011-2026, namely an objective of “A Learning and Working City - The LDP recognises the importance of education and will help to protect and develop schools for the future...”

7.3 As the application site is already in use as a school (Use Class D1, education), the improvement of existing school facilities is considered an acceptable evolution of the site and is in accordance with **LDP Policy CP13**.

7.4 Similarly, in line with the requirements of **LDP Policy SP1 (Sustainability)** the proposal makes efficient use of brownfield land in a sustainable location that is located within the settlement limits of Caerleon. Whilst the proposal will also improve “*facilities, services and overall social and environmental equality of existing and future communities*”.

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

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

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

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

Access and Parking

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

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

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

7.11 As the Transport Statement explains the proposal will include:

“Significant improvements will be made to the school’s parking arrangements. A total of 65 car, 3 minibus and 7 motorcycle parking spaces will be accessed from the school’s main entrance. The 65 car parking spaces include 8 accessible spaces for blue-badge holders and 13 EV charging spaces. Car sharing will be encouraged with 7 spaces (5%) to be prioritised for car-sharers. Also, 28 new cycle parking spaces will be provided. An

additional 59 car parking space will be available from the school’s secondary access.”

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

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

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

Conservation and Archaeology

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

- i. Be designed to preserve or enhance the character or appearance of the conservation area, having regard to the conservation area appraisal where appropriate.*
- ii. Avoid the removal of existing historic features, including traditional shopfronts and joinery. use materials which are traditional, or appropriate to their context.*
- iii. Complement or reflect the architectural qualities of nearby buildings which make a positive contribution to the character of the area.*
- iv. Pay special attention to the settings of buildings and avoid the loss of any existing domestic gardens and open spaces which contribute to the character of the area.*
- v. Avoid adverse impact on any significant views, within, towards and outwards from the conservation area.*

7.16 The site is also adjacent to a number of Scheduled Ancient Monuments, namely Caerleon Legionary Fortress and Caerleon Civil Settlement. Despite this the proposal is not considered to directly impact these historic assets.

7.17 The proposed material palette and design of the proposal has considered the rhythm and materiality of the conservation area

as identified by the ‘Caerleon Conservation Area Appraisal’. The proposal therefore includes a rhythmic approach to fenestration, with the brickwork being complementary to both the existing school buildings but importantly features of the conservation area and local historic buildings, such as the Former Caerleon College Campus.

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

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

7.20 The extent of the proposals impact on key views out of the Conservation Area are demonstrated on pages 86-88 of the submitted Design and Access Statement.

7.21 An ‘Archaeological field evaluation’ completed in January 2012 concluded that no structures of Roman date were encountered

during the course of the evaluation. However, it did identify two archaeological significant deposits:

- **Deposit 1006** - Likely to represent a Roman occupation layer, contained Roman ceramics including decorated Samian bowl sherds, Caerleon ware flagon fragments and colour coat beaker fragments, the ceramics dating from mid 1st century AD to 4th century AD.
- **Deposit 1004** - A levelling deposit containing a Post-medieval assemblage, which included ceramics dating to the 18th and 19th centuries.

7.22 The study found that whilst no structures were identified on-site the construction work will likely have an impact on the archaeological resource. As such, *“the critical depth of the Roman deposit is 15.24m OD, and any ground intrusion works at this depth or deeper, will encounter this archaeologically significant deposit and require appropriate mitigation.”*

7.23 **LDP Policy CE6 (Archaeology)** states that the Council will normally require an Archaeological Impact Assessment, before making a decision in areas of recognised archaeological interest. The proposed areas of the works are on areas where buildings have already existed. As such, it remains of low probability that any archaeological remains would be discovered. Nevertheless, there will be a need for careful construction, and we propose that

a pre-commencement condition of a Construction Environmental Management Plan (CEMP), that has a requirement for a hand dig in places is imposed to ensure that in the event any remains are found, these would be recorded.

Ecology and Biodiversity

7.24 No part of the site is within a statutory designated site of conservation value (SSSI, SAC, SPA or NNR). However, the River USK Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is located approximately 550 metres to the west of site.

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

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

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

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

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

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

Arboriculture

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

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

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

7.32 The Report recommends that efforts should be made to retain category B trees. Whilst category C trees should be retained if desired. The Report also highlights a number of category U trees that should be removed as part of the sites development and

evaluated through a site risk assessment in the sites existing form.

7.33 To enable the proposed new-build block, there is a requirement to fell a number of category B tree numbers, these are T5, T6, T7 and T8. Whilst the Report identifies these tree numbers to be considered for retention (moderate), these trees conflict with the proposed footprint of the new block.

7.34 Efforts to mitigate the impact of the loss will be made through tree planting as set out in the submitted Landscape plan, which will be in line with Paragraph 6.4.42 of PPW provides a 3:1 replacement resulting in the planting of 13 new trees on-site.

Inclusive design

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

Sustainability

7.36 The proposal includes a mixture of sustainable and renewable technologies. These features include the use of both air source heat pumps and roof mounted solar photovoltaic panels as well as elements of natural ventilation, supporting the transition to a

low carbon future in a changing climate. The proposal will also achieve a BREEAM score of excellent.

7.37 It is considered that the proposal will therefor address LDP Policy **GP1 (Climate Change)**.

8. Summary

- 8.1 This Planning Statement has been prepared to support the proposal for the demolition of teaching blocks D1 (Learning Hub), D2 (Drama), D3, G (WBQ), H (Gym), K (Conference) and L (Caretaker house) and the creation of new sports and teaching facilities at Caerleon Comprehensive School.
- 8.2 The statement provides an overview of the proposal, accompanied by site and surrounding details and background to the proposal. It sets out the relevant considerations that informed the proposal and summarises the ecological and arboricultural and heritage constraints, including the mitigation measures that are proposed.
- 8.3 The architectural design of the new care home building has considered the site's physical constraints, the operational requirements of the school, as well as the well-being of future pupils. It complies fully with the latest relevant accessibility and educational standards. The new building is expected to meet the statutory requirements and provide a modern and engaging learning environment for pupils, staff and visitors alike, an improvement from the dated teaching facilities that are proposed to be replaced.

- 8.4 Accordingly, the proposal represents a wholly acceptable form of development that complies with the relevant policies. It is for these reasons that Newport City Council is respectfully requested to grant planning permission for the proposed development.