

Appendix C SA Report Addendum of the Amended and Additional Site Consultation Report

Monmouthshire Local Development Plan Amended and Additional Sites Consultation Report Sustainability Appraisal Report Addendum

On behalf of **Monmouthshire County Council**



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1 Introduction

1.1 Purpose

- 1.1.1 The purpose of this addendum to the Sustainability Appraisal report (SA) of the Monmouthshire Local Development Plan is to take account of the 'Amended and Additional Sites Consultation Report', July 2013. This addendum has been prepared by Peter Brett Associates LLP (PBA) on behalf of Monmouthshire County Council.
- 1.1.2 This SA addendum is intended to provide a standalone report on the implications for sustainable development of the revised and additional allocations. The addendum not only considers the site allocations, but also what this means in terms of the overall level of housing growth now proposed for the County and the implications of the overall distribution of this growth.
- 1.1.3 The addendum focuses on the implications of the July 2013 Amended and Additional Sites Consultation Report. The full SA report of the LDP, to which this report provides an addendum, was prepared in September 2012, to take into account pre-Examination focused changes and consultation responses¹.

1.2 LDP Background

- 1.2.1 Examination of the Monmouthshire LDP began in May 2013 and is now adjourned until October 2013, when further sessions will be held to discuss additional issues. One of these issues is the overall provision of housing leading to the need to allocate additional housing land.
- 1.2.2 The Planning Inspector issued a Preliminary Findings Note on housing numbers. In this note the Inspector identified that the Council should allocate sufficient land for 900 additional homes. This is 450 from an identified undersupply since 2008 and 450 to provide flexibility in supply. It should be noted that this is in addition to the 4,000 already proposed to be allocated in the LDP for the plan period.
- 1.2.3 Therefore, the Council proposes to increase the housing requirement in the LDP to 4,450 homes, with an additional amount actually allocated to allow for flexibility.
- 1.2.4 As a response to the Inspector's note the Council proposed to:
- Identify extensions to or additional homes on existing Strategic Sites;
 - Identify additional housing sites.
- 1.2.5 A response to the Inspector's note was prepared by the LDP plan making team suggesting sites for extension and additional sites for allocation. The proposed sites were put before Full Council on 27th June 2013 and a final proposed list of site alterations and additions was agreed.

¹ PBA and Monmouthshire County Council (September 2012) *Sustainability Appraisal Report of the Monmouthshire County Council Deposit LDP (Amended to take account of focused changes and consultation response)*

1.2.6 The Council determined the need to consult on these amendments and additional sites, hence the preparation of the Amended and Additional Sites Consultation Report. As the consultation report involves potential significant change to the LDP, it was necessary to consider the implications for sustainable development and prepare this SA addendum.

1.3 Principal Changes

1.3.1 The proposed changes are to allocate new or amended sites to deliver a total of 700 additional homes, plus an additional site for 60 homes to be added to the total to be delivered from Urban Housing Potential sites.

1.3.2 This will see an increased yield from changes in land allocation for non-residential uses on Strategic Sites. These sites are:

- SAH3: Fairfield Mabey, Chepstow – additional 110 units;
- SAH2: Crick Road, Portskewett – additional 35 units; and
- SAH5: Rockfield Farm, Undy – additional 70 units.

1.3.3 There are also additional non-Strategic Sites, these sites are either not allocated in the submission version of the LDP or have had their boundaries substantially modified. These sites are:

- Land at Vinegar Hill, Undy (ASN076/077/078) – to provide 225 units;
- Former Sudbrook Paper Mill (ASN091) – to provide 190 units;
- Land to the south of School Lane, Penperlleni (SAH7ii) – amended boundary to provide 25 additional units; and
- Land at Chepstow Road, Raglan (CS/0247) – to provide 45 new units.

2 Additional Housing Growth

2.1 Introduction

2.1.1 The proposed additional and amended sites will mean that the LDP is planning for the delivery of 4,450 new homes over the plan period to 2021. This quantity provides homes to make up a shortfall in delivery between 2008 and 2011 based on the Welsh Government's household projections of 400 per year. The Inspector also indicates that some flexibility in housing sites is needed to allow for sites not being delivered in the plan period. Therefore, a further 8.5% is added to the housing figure so that sufficient housing is allocated to ensure delivery of the identified growth requirements, should allocations not come forward.

2.1.2 The Council have responded through the allocation of additional sites that have implications for the overall spatial pattern of growth in Monmouthshire.

2.2 Level of Growth

2.2.1 The SA report of the Monmouthshire LDP went through several stages of options generation and appraisal. This included the SA of the sustainability impacts of pursuing options for either low, medium, or high housing growth. Information on the appraisal of growth options is in the SA Report, September 2012, sections 8.9 – 8.16.

2.2.2 This addendum looks again at the findings of earlier stages of SA with the aim of identifying the broad assumptions that can be made on the sustainability benefits and adverse impacts of a higher housing requirement for the County. In summary, the benefits of a higher level of growth are that:

- There is greater potential to provide more affordable homes and currently there is likely to be an under provision;
- It may better support local services and facilities;
- It may result in higher levels of financial contribution to support new infrastructure, and community facilities and services;
- Providing a range of homes to meet people's needs;
- May make development more viable where delivery is dependent on provision of significant new infrastructure; and
- Help support local economic growth and the potential to better match the high levels of employment land allocations with new housing.

2.2.3 However, some assumptions can also be made on the potential negative effects of a higher growth level. These include:

- A greater quantity of land is required for development, particularly greenfield sites;
- Land originally allocated for other uses, e.g. employment or community uses, may need to be reallocated for housing;

- Environmental protection constraints at some settlements in the County may mean additional growth has to be pushed to sites that could potentially be less sustainable for other reasons, e.g. accessibility and reducing the need to travel by car;
- More homes means greater resource use in their construction and operation; and
- Higher resource use in Monmouthshire.

2.2.4 Growth levels now set by the LDP are around 445 homes per year for 2011 to 2021, not including the flexibility allowance. This represents a higher level of growth than that commented on in the SA of the Deposit Plan (Focused Changes, September 2012). Therefore, the potential for sustainability impacts is greater.

2.2.5 This SA addendum does not seek to query the evidence used by the Inspector to recommend an increase in the housing requirement for the County. The Inspector is clear that based on Welsh Government projections the risks of not planning for additional growth would be to provide insufficient housing to meet Monmouthshire's growing need. However, the increase in growth requires new sites be found for allocation. The Council is keen for new sites not to prejudice the delivery of the LDP Strategic Sites needed to deliver the LDP strategy, but also recognises the constraints on development in the Main Towns in terms of environmental quality and access to employment. This means land must be allocated in some locations less favoured by the SA of the full LDP. This is addressed in more detail in **Chapter 3**.

2.2.6 The sustainability of growth options cannot be considered in isolation from the distribution of growth as this is likely to be a greater determinant of the impact of development than numbers alone. Consideration of the distribution of growth is given in **Chapter 3**.

2.3 Flexibility

2.3.1 An additional element of flexibility in housing provision is proposed to be included in the overall housing requirement and the allocation of land. The Inspector suggested a 10% flexibility allowance. However, the Council identifies an 8.5% flexibility contingency of the total supply to 2021 and this equates to around 370 homes.

2.3.2 Having some flexibility in the quantity of housing allocated can have benefits, in that it helps to avoid a risk of undersupply if a strategic site is stalled. However, there are also sustainability risks related to over-supply of housing land. A particular risk is that it will require the allocation of sites that are less favourable in terms of creating a sustainable spatial strategy, due to the lack of other suitable sites, but which may be more attractive to developers. Therefore, the sites allocated to provide flexibility may be delivered at the expense of Strategic Sites that are identified as having sustainability benefits, such as regeneration, use of brownfield land or greater accessibility.

2.3.3 It may be beneficial to sustainable development to phase delivery of some sites to later in the plan period to provide flexibility, rather than having all the sites available from the start. This could help prioritise some sites that are best able to deliver sustainability benefits for the County as a whole. However, a five-year land supply will need to be maintained and sites released early if required.

3 Distribution of Development

3.1 Introduction

- 3.1.1 As introduced in **Chapter 2** the distribution of proposed additional and amended sites has implications for delivering sustainable development.
- 3.1.2 This chapter of the addendum considers the implications for sustainable development of the proposed distribution of development and the SA of the spatial strategy.
- 3.1.3 In total, new and amended allocations will provide for 700 new homes, with a further 60 new homes to be provided as an Urban Housing Potential site at Coed Glas in Abergavenny. Of the 700 new homes, 215 (31%) will be on Strategic Sites and the remainder will be on new or amended housing sites, a total of 485 homes. 520 new homes are allocated in Severnside, 110 in Main Towns and 70 in Rural Secondary Settlements.

3.2 Location of New Sites

- 3.2.1 The preference for finding sites for the additional housing has been to find additional capacity on the Strategic Sites as identified in the LDP. Several of these Strategic Sites need new infrastructure to be implemented as part of their delivery. This means that if the Council were to allocate a large amount of additional housing on new sites, these may be seen as easier to deliver by developers, which could undermine the delivery of the Strategic Sites and thereby the LDP's spatial strategy.
- 3.2.2 However, only 31% of the additional requirement can be accommodated on the Strategic Sites. Therefore there is a need to find alternative sites in the County to accommodate the remaining allowance.
- 3.2.3 The Council have decided to allocate the majority of this additional growth in the Severnside area. Two allocations in this area, Vinegar Hill and Sudbrook Paper Mill, are to provide 415 new homes, which is 59% of the total new allocation of 700. The remaining sites to be allocated are land at Chepstow Road in Raglan and land south of School Lane in Penperlleni.
- 3.2.4 Directing new development to Severnside is identified by the Council as a way of helping to secure the delivery of the Strategic Sites in the Main Towns, such as Wonastow Road, Monmouth and Fairfield Mabey, Chepstow. If new sites were to be allocated in these towns, it is very likely they would have to be greenfield and very attractive to developers, potentially hindering the development of those sites that are identified as essential to the spatial strategy.
- 3.2.5 Focusing additional development in these Main Towns can have benefits, especially if it is possible to achieve greater self-containment in terms jobs and homes, which can help reduce the number and length of car trips, this is discussed further in **section 3.3**.
- 3.2.6 The approach taken by the Council to prioritise sites for allocation results in a greater proportion of overall development being directed to the Severnside area than was the case in the Deposit LDP. This has implications for the spatial strategy as it was appraised in the

Deposit LDP and an impact on sustainable development as identified in more detail in **section 3.4**.

3.3 Main Towns

- 3.3.1 The SA of the spatial strategy in the SA of the full LDP supported an approach that focused the majority of the development in the Main Towns, as these are the most likely to support self-containment in terms of jobs, homes and sustainable communities. This SA addendum supports those earlier findings and in principle supports the growth of these towns in preference to other parts of the County, including Severnside and Rural Secondary Settlements.
- 3.3.2 In considering the sustainability of the sites in the Main Towns the SA addendum recognises the constraints to development in and around them. This includes the towns being in areas of high quality natural environment that constrain expansion and having relatively limited supply of employment land. It is for such reasons and the need to ensure the Strategic Sites that are identified are delivered (**paragraph 3.2.4**) that new allocations are not included for these towns.
- 3.3.3 However, in terms of sustainability it will be necessary for consideration to be given to the long-term viability and vitality of these towns. Sites for new homes and jobs will need to be delivered in and beyond the plan period to enable towns and their communities to thrive. In the future, decisions will have to be made on the release of land for housing and employment to avoid stagnation, weighed against the need to protect the natural environment.

3.4 Severnside

- 3.4.1 Directing new housing to the Severnside area has the potential to have positive and negative sustainability impacts. These arise from access to employment, access to community services and what this means in terms of numbers and lengths of car trips.
- 3.4.2 The Severnside area is the location of a large proportion of existing and proposed employment sites in the County. Therefore, there is the potential for benefits for sustainable development from new housing allocations in this area if it helps in more people being able to live near their place of work. However, as the SA of the full LDP identifies, given the location of the Severnside area on the M4 corridor and the current high level of car commuting, it is unrealistic to assume that it would ever be possible to achieve very high levels of live-work self-containment in Severnside. Also, many of these large employment allocations will perform a regional role with workers commuting in from a wider area along the M4 and M5 corridors. Therefore, it is not clear if more housing in the Severnside locations would necessarily reduce the amount and length of car commuting.
- 3.4.3 The two Strategic Sites in Severnside that have had their housing provision increased have done so at the expense of employment land. Losing employment land as part of these mixed use site could have adverse impacts for the local economy and for local jobs. These sites may be very suitable for small businesses and local start-ups, providing the type of employment land or premises that is not necessarily found on the larger industrial estates and

- business parks. This may mean that the loss of land on these mixed use sites may have some adverse impact on the supply of a range of sites to meet diverse business needs.
- 3.4.4 The SA report identifies that there is a risk in the Severnside area that housing and employment will not be delivered together, with housing potentially being delivered at a faster rate. If this is the case then this will risk exacerbating the 'commuter' characteristics of some of the Severnside settlements. As suggested in paragraph 10.32 of the SA report, phasing the release of some housing land may help address this.
- 3.4.5 A further concern for sustainable development related to the Severnside allocations is the relatively poor accessibility of these sites to local services and what this means in terms of creating good quality places to live. The sustainability of individual sites is considered in greater detail in **Chapter 4**, but this section considers some of the combined and strategic sustainability impacts.
- 3.4.6 Housing to be delivered on the periphery of Magor/Undy has been increased substantially by the new and revised allocation. Now a combined total of 495 new homes are allocated on the Rockfield Farm site and adjacent Vinegar Hill site. This represents a quite substantial increase in the size of this settlement. The SA of site SAH5 Rockfield Farm in the SA of the full LDP is applicable to the combined sites. Particular sustainability concerns of the SA relate to the relatively poor accessibility to essential services and jobs by transport modes other than the car, the risk of increased car use and the need to ensure development can deliver new communities not just new homes. The combined site increases the risks of adverse sustainability impacts.
- 3.4.7 Development will need to be delivered in a coordinated way for both sites to ensure that local services are in place to support this population and help create a good place to live. New development should include the provision of new services to meet the needs of residents and help create a place that has its own identity but feels connected with the settlement from the outset. This could include provision of new local shops, community services, community spaces, and a primary school if necessary. Without some community provision there is the real risk that development in this location, with easy access to the M4, could become characterised as a 'commuter' estate, with little local life. This is especially the case as the nearest local centre is in Magor over 800m walking distance from the sites and local residents are very likely to rely on their cars as their preferred transport to meet all their day-to-day needs.
- 3.4.8 Policy should also be in place to ensure that walking and cycling improvements are provided to better link these sites to Magor centre and employment areas, with the aim of demonstrating how delivery of development at the site will achieve a modal shift away from car use.
- 3.4.9 The other additional Severnside site is the former Sudbrook Paper Mill. This site can provide new housing, although will result in the loss of an existing employment site. However, in a similar way to the Magor/Undy sites, this location risks having an adverse effect on sustainability objectives related to supporting new communities and ensuring good accessibility. The site is quite isolated, is cut off by the railway line and adjacent to the Severn Estuary. The site is not really of a size to support additional local services, although some

local services including a local shop and primary school are only around 1km away. However, it is likely that the majority of new residents will choose to drive as their primary form of access to all services, jobs and schools, due to the nature of the road connecting the site to Portskewett and Caldicot.

3.5 Rural Secondary Settlements

- 3.5.1 The remaining allocations are in settlements identified as Rural Secondary Settlements in the LDP. The allocation in these settlements only totals 70 new homes over the plan period in addition to what has already been allocated. The SA report of the full LDP, paragraph 10.9, identifies the potential for limited growth in rural locations to bring benefits to smaller communities, especially in terms of providing homes to meet the needs of the community and supporting local village services. These SA findings are applicable to the sites now proposed and supported by this addendum.

3.6 Affordable Housing

- 3.6.1 The proposed new and amended allocation put about 75% of the additional housing land to be allocated in the Severnside settlements. In Severnside only 25% of homes need to be delivered as affordable, compared to 35% outside this area where land values are higher. This means that fewer affordable homes will be provided overall as a result of the proposed amendments and new allocations. This has possible implications against sustainability objectives of providing a home for all.

4 New and Amended Allocations

4.1 Introduction

- 4.1.1 To remedy the shortfall in housing provision, the Inspector has advised that the Council identify both extensions to the existing Strategic Sites and other additional sites, sufficient to provide additional dwellings over the plan period.
- 4.1.2 In terms of *extensions to existing sites* the following are proposed:
- A.2 Fairfield Mabey, Chepstow (strategic site SAH3);
 - A.3 Crick Road, Portskewett (strategic site SAH2);
 - A.4 Rockfield Farm, Undy (strategic site SAH5);
 - B.3 Land to the south of School Lane, Penperlleni (policy SAH7 (ii)).
- 4.1.3 The original site allocations have already been assessed as part of the SA of the Deposit LDP and Focused Changes SA. This appraisal included general consideration of the suitability of the sites as well as detailed appraisal as part of the allocations policies for each site. These appraisals can be found in the *Focused Changes SA Report*, September 2012.
- 4.1.4 As set out in Chapter 1, the shortfall in housing identified by the Planning Inspector could not be met simply through extensions to existing sites, so the Council have determined to allocate additional land. These *new sites* are:
- B.1 Land at Vinegar Hill, Undy;
 - B.2 Former Paper Mill, Sudbrook; and
 - B.4 Land at Chepstow Road, Raglan.
- 4.1.5 Sites B.1 and B.2 were subject to SAs undertaken by developers promoting the site through the Deposit LDP consultation. All of these developer SAs were reviewed by PBA as part of the *Alternative Sites: Independent Review of Site Sustainability Appraisals*, June 2012, to assess the validity of these appraisals.
- 4.1.6 For all of the sites the Council have undertaken a 'Traffic Light Assessment' (TLA) as referred to in the 'Site Selection' section of the SA report, which assessed each site against a set of environmental, social and economic performance criteria.
- 4.1.7 The following sections provide an addendum to the SAs already completed by the developer or PBA for each of the sites, and the Independent Review where relevant. The addendum focuses on new sustainability issues raised by the amended and additional sites; it does not alter the findings of the earlier SAs unless otherwise specified.

4.2 A.2 Fairfield Mabey, Chepstow

- 4.2.1 This is a brownfield site which has been identified by the Council to have capacity to accommodate additional dwellings. It is identified as a strategic site in the LDP, important for delivering the plan's spatial strategy.

- 4.2.2 The site was allocated (policy SAH3) in the Deposit Plan for a mixed use residential and employment development, providing no more than 240 dwellings and 3 ha of employment land. Focused Changes amended the criteria relating to the provision of housing *from 'no more than 240 dwellings'* to *'Around 240 dwellings'*, thereby removing a maximum capacity to be delivered on the site. The Focused Changes also provided extra criteria to protect the River Wye SAC.
- 4.2.3 In response to the Inspector's advice to remedy the shortfall in housing provision, this site has been identified for a further 110 dwellings, giving a total of 350 dwellings.
- 4.2.4 A previous SA was completed on Deposit Plan and then on the Focused Changes, both on the basis of 240 dwellings and employment use.
- 4.2.5 The original SA suggested that the density was quite low for this accessible location and higher densities are favoured. Increasing the number of dwellings by 110 dwellings could be achieved by increasing densities on the site. This would increase the efficient use of previously developed land in a sustainable location. It would also help to support existing services and provide a critical mass of population to help deliver new local services.
- 4.2.6 As stated in the previous SA, the new development will need to ensure it complements the adjacent Conservation Area and views from the A48. With increased density this is increasingly important. The design, including an increased number of homes, will also have to ensure that it does not harm the setting of nearby listed buildings and structures, including the railway bridge and Chepstow Castle.
- 4.2.7 Part of the site is in Zone C2 floodplain and an increase in the number of dwellings should not put residents at risk or exacerbate the risk of flooding elsewhere.
- 4.2.8 The site is within a central location in Chepstow with good access to services and public transport. The site is physically separated by the railway and river, so new pedestrian and cycle access will need to be delivered to ensure accessibility.
- 4.2.9 Increasing the number of dwellings could increase the impact of the development on the adjacent River Wye SAC. Development of this site must protect the adjacent River Wye SAC from harm and any contamination remediated to protect health and avoid pollution of watercourses. As stated in the previous SA of the site, site specific appropriate assessment under the Habitats Regulations Assessment is likely to be required, as specified in the LDP Habitats Regulations Assessment.
- 4.2.10 This is a brownfield site in a sustainable location close to the town centre and public transport. There are a number of constraints on development which could impact on the deliverability of the site. Increasing the density and number of dwellings of the development could improve the viability and deliverability of the site.
- 4.2.11 As stated in the previous SA of the site, walking and cycling access routes need to be improved. The site is adjacent to the River Wye SAC and it is essential that the nature conservation site is not harmed during the construction and occupation of the site.

4.2.12 The previous SA of Focused Changes suggested that a larger area of employment development may be suitable at this site to help deliver new jobs in the town. Increasing the number of homes could increase the amount of housing land required, thereby reducing the amount of employment land required in this location. Therefore, increasing the density of residential development, rather than encroaching on employment land, is necessary to maintain the value of the site for local employment to compensate for the loss of this former employment site.

4.3 A.3 Crick Road, Portskewett

4.3.1 This is a greenfield site on the northern periphery of Portskewett near Caldicot. This is identified as a strategic site in the LDP necessary for delivering the plan's spatial strategy.

4.3.2 The site was allocated (policy SAH2) in the Deposit Plan for a mix of employment and residential development. 250 dwellings were to be provided on a net site area of 7.42 ha, together with 2 ha of serviced employment land in association with adjoining land within the Village Development Boundary (if this additional land did not come forward then a financial contribution would have been required to assist in making an equivalent employment provision off-site).

4.3.3 Focused Changes amended the criteria relating to the provision of housing from 'no more than 250 dwellings' to 'Around 250 dwellings', thereby removing a maximum capacity to be delivered on the site.

4.3.4 In response to the Inspector's advice to remedy the shortfall in housing provision, this site has been identified for a further 35 dwellings, giving a total of 285 dwellings. This would include an extension to the west of the site, providing a further 1.3 ha. The landowner has confirmed this land is available to be developed with the originally allocated Crick Road site. To achieve the increased housing yield would also necessitate a 1 ha reduction in the employment land element of the allocation.

4.3.5 A previous SA was completed on the basis of residential development only.

4.3.6 A further extension of the site to provide increased housing would result in an increased take-up of high quality agricultural land and landscape impact. Development will need to protect landscape boundary features such as field oaks and require careful landscape planting.

4.3.7 The previous SA stated that the proposed development was being promoted for quite a low density development at only 34 dwellings per ha. It recommended that to achieve more sustainable use of land, even higher densities are favoured. Increasing the densities for this small increase of 35 dwellings could mean that the development can be delivered over a smaller area, thereby reducing overall land take.

4.3.8 Delivery of the site could help support improved walking and cycling routes to the local centre at Caldicot.

4.3.9 An increased number of proposed dwellings will need to ensure it complements the Caldicot Castle Conservation Area and Caldicot Castle.

- 4.3.10 The previous SA picks up that part of the site may be contaminated. An increase in housing provision will make the remediation of any contamination and therefore the deliverability of the site more viable. Remediation will need to be undertaken to protect health and avoid pollution of watercourses.
- 4.3.11 There will be a reduction of 1 ha of employment land from the original Deposit Plan allocation. Although there is a considerable amount of land allocated for industrial use elsewhere in the south of the County, a reduction in employment land within this allocation could reduce the opportunity to increase the range of employment uses in this location.

4.4 A.4 Rockfield Farm, Undy

- 4.4.1 This is a greenfield site comprising 10.4 ha on the north eastern edge of Undy. It is adjacent site B.1 land at Vinegar Hill. Rockfield Farm is identified as a strategic site in the LDP necessary for delivering the plan's spatial strategy.
- 4.4.2 The site was allocated in the Deposit Plan for a mixed use residential and employment development, comprising 4 ha of employment land and 200 dwellings. Focused Changes amended the criteria relating to the provision of housing from *'no more than 200 dwellings'* to *'Around 200 dwellings'*, therefore removing a maximum capacity to be delivered on the site.
- 4.4.3 In response to the Inspector's advice to remedy the shortfall in housing provision, this site has been identified for a further 70 dwellings, providing a total of 270 dwellings. This would necessitate a 2 ha reduction in the employment land element of the allocation. The Council suggest that the loss of 2 ha of employment allocation is not considered to be significant, in light of considerable amount of land allocated for industrial use in Magor.
- 4.4.4 A previous SA was completed on the basis of 200 dwellings and 4 ha of employment land. The previous SA of the site outlined the potential sustainability commentary relating to the site. The site boundary has not changed and the commentary relating to take-up of agricultural land, impact on the natural environment, historic environment and landscape is still relevant to the revised allocation. Design of the proposal should minimise the impact of the development on these issues.
- 4.4.5 The site has limited direct access to services and the nearest general store, doctors and recreation space is approximately 1 km from the site. Increasing the number of homes on the site will result in more homes being developed in a location without facilities in close proximity. As stated in the previous SA, new community facilities should be provided on site if possible and more details should be provided in the policy as to what these should include to help create a more sustainable place.
- 4.4.6 The delivery of the site should include improvements to walking and cycling links into the local centre at Magor.
- 4.4.7 The site is not adjacent to any employment areas and much of the employment land supply in the area is for large business units and industrial sheds. The reduction in the employment land allocation may have an impact on the provision of a range of types of employment land in the area, suitable for smaller businesses and start-ups.

- 4.4.8 The site is very close to the M4 which could impact on new residents with noise and poor air quality. An increased number of dwellings will increase the number of people potentially affected. As stated in the previous SA, appropriate sound mitigation will be necessary to avoid adverse impacts of noise on new residents. Proximity to the M4 may also have adverse impacts on health from poor air quality on an increased number of residents.
- 4.4.9 The site is adjacent the proposed new site (B.1) at Vinegar Hill, Undy. The cumulative impact and benefits of additional residential development in this location needs to be considered, as covered in **Chapter 3**.

4.5 B.3 Land to the south of School Lane, Penperlleni

- 4.5.1 This is a greenfield site comprising 3 ha on the southern edge of Penperlleni.
- 4.5.2 The site was allocated in the Deposit Plan (SAH7 (ii)) for 40 dwellings on 1.34 ha. The site was promoted again for consideration as an Alternative Site, although with an extended boundary to bring the site up to 3 ha. It is this site with additional land that is now proposed to be allocated.
- 4.5.3 In response to the Inspector's advice to remedy the shortfall in housing provision, this site has been identified for a further 25 dwellings, which would provide a total of 65 units.
- 4.5.4 A previous SA was completed on the basis of 40 dwellings. The sustainability comments in the previous SA remain. However, an increase of 20 homes could result in more people having to travel outside the village to work, due to limited employment opportunities in the village.
- 4.5.5 The site has good bus services and is within close proximity to various facilities, including a school, shop, nursery, church, doctor's surgery, public house and community hall. Additional homes and residents could help support these services.
- 4.5.6 The site is located within a character area that has a high/medium landscape sensitivity. The TLA states *that 'the site is located within a character area that has low capacity for housing due to its intrinsic character and its role as a setting to the canal and National Park'*. However, the additional land means that more space is available for landscape, which may help mitigate some of the visual impact on the village edge. Landscaping and retention of key features would be essential to protect the character of the area. However, densities are quite low and should be at least 30pdh to make the best use of land, as stated in the previous SA.
- 4.5.7 The TLA states there are European Protected species issues to be considered at this site. An increase in homes could have an increased impact on biodiversity. Therefore, any proposal needs to ensure that protected species are protected.

4.6 B.1 Land at Vinegar Hill, Undy

- 4.6.1 This is a greenfield site located on the northern edge of Undy and south of the M4. The site is directly adjacent to Rockfield Farm (SAH5), an allocated strategic site proposed for expansion.

- 4.6.2 The site was not allocated in the Deposit Plan. Subsequently, it was promoted to the Council and was consulted upon in the Alternative Sites consultation (ASN076/77/78). A SA was completed for each option by the developer/promoter. The submission to the Council can be viewed at: http://www.planningpolicy.monmouthshire.gov.uk/downloads/file/2136/1103-bovis_homes_nathaniel_lichfield_and_partners.
- 4.6.3 In response to the Inspector's advice to remedy the shortfall in housing provision, this site has been identified for 225 dwellings.
- 4.6.4 The developer suggested in their SA that this site and Rockfield Farm, Undy are designed together. Therefore, the cumulative impact and benefits of additional residential development in this location needs to be considered. If both sites are allocated for housing, it would be imperative to ensure that the sustainability issues highlighted within the original SAs and issues outlined below are addressed.
- 4.6.5 To develop the whole site, a new vehicular access route can be made available from the allocated Rockfield Farm (SAH5), Undy. The sites are in different land ownership and the site is unlikely to be delivered in its entirety without access through the strategic site. Therefore, the Council would need to require this of the developers of both sites. This option may make this site cut-off from the rest of the settlement and a new access, particularly new footpaths and cycleways would be essential to allow quick access to Magor centre, which is less than 800m from the western end of the site.
- 4.6.6 However, the site could also be accessed from the west built off the proposed Magor and Undy Bypass. This new route would mean better access to the M4 and this may have the detrimental effect of encouraging commuting at this site, with adverse sustainability impacts related to increased car use and reduced community cohesion and identity. In terms of sustainability this may be a less favourable option than access through the Rockfield Farm site (with additional foot and cycle access to the south and west).
- 4.6.7 As stated in the Independent Review of Respondent's SAs, *'there remains the risk that development in this location will continue to contribute to the 'dormitory' character of the area. The respondent's SA states that this development will be beneficial in overcoming this. However, at this stage it is difficult to assess these potential impacts with any certainty'*. There remains the risk that development in this location will continue to contribute to increased car use.
- 4.6.8 Any development of this size would need to ensure the new neighbourhood is designed to a high quality and layout so that it is well integrated to the existing settlement. It should have good links/access, via foot and bicycle, with the existing settlement to the south, and into Rockfield Farm. This will reduce the need to travel by car and improve social cohesion between existing and new residents.
- 4.6.9 Local shops and services are approximately 1 km away from the site. Any proposal should ensure that the right level of community facilities and services are provided for within any development, and have good access via footpaths and cycleways.

- 4.6.10 It would also be important to ensure the right level of employment is delivered, to create a sustainable settlement. The original 4 ha of employment at Rockfield Farm is now being reduced to 2 ha. This may reduce the range of sites on offer to businesses, and could impact on available smaller sites for new start-ups and smaller businesses.
- 4.6.11 The site is within a potential Minerals Safeguarding Zone and the impact of development is unknown. The Council's TLA indicates further investigation of Surface Water Flooding may be required on the site, which is not referred to in the respondent's SA.
- 4.6.12 The TLA identifies that a large portion of the site is allocated as Amenity Open Space and a number of footpaths run through the site. This currently serves the existing residents of Undy and development in this location would remove this recreational area serving the existing population. Development should retain open space and provide good access via foot and cycle for both existing and proposed new residents. Public access to footpaths should be retained and designed into any new development.
- 4.6.13 There are European Protected species issues and SINCs adjacent to and near the site. An Area of Special Archaeological Sensitivity runs through the south eastern part of the site, and Scheduled Ancient Monuments along the eastern boundary of the site and within the south western portion of the site. There is a large proportion of the site allocated as Green Wedge and an area designated as Special Landscape Area located 60m to the north of the site. These issues need to be considered within any proposal, as identified in the TLA.
- 4.6.14 It may be suitable for this site to be phased later in the plan period, subject to the delivery of Rockfield Farm Strategic Site, which may need to be delivered to allow site access in any case.

4.7 B.2 Former Paper Mill, Sudbrook

- 4.7.1 This is a brownfield site located adjacent the Severn Estuary and on the southern edge of Sudbrook. The site is protected for employment use in the Deposit LDP.
- 4.7.2 The site was not allocated for housing in the Deposit Plan. Subsequently, it was promoted to the Council during the Deposit LDP consultation (ASB091) for 350 dwellings and the site has been subject to planning application that has been refused and taken to appeal. The Alternative Sites submission included a SA completed by the developer/promoter that can be viewed at: http://www.planningpolicy.monmouthshire.gov.uk/downloads/file/2285/2168-harrow_estates_plc_gva_grimley.
- 4.7.3 In response to the Inspector's advice to remedy the shortfall in housing provision, this site has been identified for 190 dwellings.
- 4.7.4 The existing size of Sudbrook is 140 dwellings, plus a recent permission for an extra 46 dwellings. There are no community facilities or services at Sudbrook, and it is some distance from main facilities of Caldicot/Portskewett settlements. The additional housing is likely to serve as a 'commuter' settlement, with the majority of new residents reliant on car travel to meet most of their day-to-day needs, such as access to shops, schools and jobs. This could

- have an adverse impact on the character of the community and the site is unlikely to help foster greater community identity and cohesion.
- 4.7.5 The redevelopment of the site would result in the reuse of previously developed land and removal of existing industrial buildings and remediation of contaminated land and this could have a positive impact on the visual appearance of the site in this potentially attractive location adjacent to the Severn Estuary.
- 4.7.6 The site is adjacent to the River Severn SPA, Ramsar and SSSI. Redevelopment of the site will need to ensure that there is no impact on the areas of biodiversity and if necessary this would need to be tested through appropriate assessment under the Habitats Regulations. The site now also has some historic interest and this will need to be respected in the design and delivery of new development.
- 4.7.7 Remediation of this contaminated site may impact on the viability of the site, which could impact on the deliverability of housing in this location.
- 4.7.8 The Council's TLA highlights that '*the access is not considered suitable for the proposed use. The immediate access to the site is from a bend in Sudbrook Road and then a level crossing over the railway siding, via a single lane bridge with narrow approach roads.*' The traffic light assessment also states that '*the existing bridge should be replaced by a new two lane bridge with improved alignment on the approach Roads. This will require third party land outside the application site boundary.*' The development will need to ensure that the access is safe and adequate for this level of additional traffic. However, the Council confirm that subsequent Traffic Impact Assessment work, in connection with the planning application, has demonstrated that this access is acceptable for the residential development proposed.
- 4.7.9 Part of the site is located within flood zones C1 and B. The development would need to be outside high risk flood plain. Proposals would require appropriate mitigation measures put in place to protect residents of the site and surrounding areas from the risk of flooding.
- 4.7.10 Discussions at the Examination included that the increase in residential properties at this location would address the imbalance between the amount of employment land allocated in the area in relation to the limited extent of residential development proposed. However, the site is over 1km from the nearest employment site, existing or proposed, and therefore is unlikely to support more people accessing work by non-car modes. There is the risk that development here would be a commuter settlement for the wider area.

4.8 B.4 Land at Chepstow Road, Raglan

- 4.8.1 This is a greenfield infill site located on the southern edge of Raglan.
- 4.8.2 The site was allocated in the Draft Deposit LDP for 45 homes (policy H7ii). It was then excluded from the Deposit LDP following a Member decision.
- 4.8.3 In response to the Inspector's advice to remedy the shortfall in housing provision, this site has been proposed for re-allocation and is identified for 45 dwellings.

- 4.8.4 A previous SA by PBA was completed on the basis of 45 dwellings, and can be found in the Deposit SA report. The site boundary has not changed and the commentary relating to good access to services and buses, limited access to employment, landscape impact and historic environment is still relevant to the new allocation. Design of the proposal should minimise the impact of the development on these issues.
- 4.8.5 The southern part of the site is within floodplain, as there is a watercourse, and there are a number of utility services crossing the site which could restrict its developable area.
- 4.8.6 The Council's TLA states that the site is located within a landscape character area that has 'high/medium sensitivity. Development in this location would need to ensure that it minimises landscape impact through good quality design and landscape mitigation measures.

5 Summary

5.1 Growth

5.1.1 The increased growth in Monmouthshire as a result of the preliminary findings of the Planning Inspector may have implications for sustainable development in Monmouthshire. However, it is difficult to draw any conclusions on these impacts without considering how the new development will be distributed throughout the County.

5.2 Distribution of Growth

- 5.2.1 The proposed distribution of new and amended allocations results in most additional housing development being directed to the Severnside settlements. The SA of the full LDP was critical of directing development to this location as it does not perform well in terms of sustainability due to its position on the M4 corridor and relatively poor provision of local services in many of the settlements in the area relative to number of homes. This means the area has high levels of car use, with many existing residents driving to meet all the day-to-day needs including getting to work. The result is that many of the communities are 'dormitory' or 'commuter' settlements that can be characterised by lack of community character and cohesion. Therefore, focusing development in this area would not be in keeping with a sustainable spatial strategy that aims to reduce the need to travel and to help create and support sustainable communities.
- 5.2.2 An additional 520 homes, out of a total additional 700 to be allocated, are being directed to Severnside. Therefore, the risks of incompatibility with a sustainable spatial strategy identified in the SA of the LDP are applicable here. However, there is the potential, depending on how sites are delivered, to achieve some sustainability benefits from these sites. In particular, the substantial expansion of Magor/Undy could support the delivery of new community services or local shops to support communities in this area. Furthermore, securing good quality cycling and walking routes to Magor centre could help integrate new development with the settlement and support existing services.
- 5.2.3 Severnside is the focus of much of the existing and proposed employment land in the County. Therefore, providing additional homes in the area could help more people live near to their work, reducing the need and distance people travel to work and ideally reducing car use. However, it should be recognised that many of the employment opportunities in the area serve a strategic function, due to their location on the M4 corridor, meaning workers will always commute into these sites. Also, existing high levels of car commuting and access to the M4 will mean it is unrealistic to assume high levels of self-containment could ever be achieved.
- 5.2.4 There is also the risk that employment sites would not be delivered at the same rate as housing sites. Phased delivery could help ensure that housing growth did not significantly precede delivery of employment land, as this would further undermine attempts to achieve greater self-containment.

- 5.2.5 The SA also identifies that housing sites could be phased to favour development on Strategic Sites. All or a selection of additional allocations could be phased for release later in the plan period, although released earlier if necessary to ensure the delivery of homes to meet needs.

5.3 New or Amended Allocations

- 5.3.1 All the sites proposed for amendment or new allocations have previously been subject to SA, either by PBA in the SA of the Deposit LDP / Focused Changes, or by developers as part of the Alternative Site submissions. These developer SAs were also subject to review by PBA to verify the findings of the SA; this review was reported as part of the LDP Report of Consultation.
- 5.3.2 **Fairfield Mabey, Chepstow** – An additional 110 homes are proposed at this Strategic Site in a Main Town. The SA is supportive of this increase as it makes best use of this brownfield site that offers the opportunity for riverside development in central Chepstow. However, the design of development must be of a high quality to protect heritage assets as well as incorporating measures to protect the River Wye Special Area of Conservation.
- 5.3.3 **Crick Road, Portskewett** – An additional 35 homes are proposed on this Strategic Site in a Severnside settlement. This is a limited increase in numbers at this site and therefore the SA as it appears for Policy SAH2 of the Deposit LDP is still relevant. The SA of the amended site identifies that the reduction in the employment land area to accommodate housing growth, may have an impact on the availability of a range of employment sites in the Severnside area to respond to the differing needs of businesses. In particular, these mixed use sites could have provided land or premises for small or start-up companies to be integrated into the settlement. Therefore, the loss of these sites could have an adverse impact on the local economy and employment.
- 5.3.4 **Rockfield Farm, Undy** – An additional 70 homes are proposed at this Strategic Site in a Severnside settlement. The SA completed for the site allocation (Policy SAH5) in the Deposit LDP is still relevant, with key concerns being access to services from this site. The increase in housing here may exacerbate the commuter character of the area and create a 'dormitory' estate where people travel out by car to meet all their day-to-day needs. This is contrary to objectives of reducing car use. The loss of employment land may also have economic impacts as outlined for the Crick Road site.
- 5.3.5 The site is adjacent to a large new allocation, 'Land at Vinegar Hill, Magor'. Combined these two sites create a significant extension to Magor/Undy. These sites have the potential to create a significant 'commuter' estate, but if delivered in a coordinated way could help secure benefits for future residents, including the provision of new local facilities, community infrastructure and improved accessibility by public transport, walking or cycling to Magor centre, principal employment areas and other services further away.
- 5.3.6 **Land to the south of School Lane, Penperlleni** – An additional 25 homes are proposed in an extended site in a Rural Secondary Settlement. This site was subject to appraisal as part of the SA of the Deposit LDP (policy SAH7ii). The findings of the SA are still applicable, although the additional land may now allow some improved landscaping of the site to help protect the character of the village edge and views from the countryside. The new homes may

help support village services, although given the relatively low level of local facilities, most of the travel from the site is likely to be by car, contrary to objectives of reducing car use.

- 5.3.7 **Land at Vinegar Hill, Magor** – This is the largest new allocation, proposed for 225 new homes in a Severnside settlement; it is adjacent to Strategic Site SAH5 'Rockfield Farm'. The SA identifies that many of the sustainability impacts of delivering this site will be as for the Strategic Site. However, the SA raises the importance of considering the two sites in a coordinated way, as together they are allocated for almost 500 new homes. These sites have the potential to exacerbate the 'commuter' characteristics of the settlement, with the risk of creating a place with little community character and cohesion as most people will drive to meet their day-to-day needs resulting in limited opportunities for community interaction and counter to objectives for reducing car use. Combined, the sites may help support new community facilities and may require additional services, such as a primary school or GP.
- 5.3.8 The site is also in a sensitive location and any new development will need to ensure protection of the biodiversity and heritage assets identified on and around the site.
- 5.3.9 In addition, sustainable access to the site needs to be secured. Access needs to be delivered with the Rockfield Farm site in a coordinated way and the two sites should be linked. Furthermore, the Vinegar Hill site should have new pedestrian and cycle links to Magor and access to bus stops.
- 5.3.10 Phasing the site late in the plan period may help ensure there is the opportunity to deliver access and prioritise the Strategic Site.
- 5.3.11 **Former Paper Mill, Sudbrook** – This is a new allocation for 190 homes in a Severnside settlement. The site's location, adjacent to the Severn Estuary and separated from the rest of the County by the railway line, means this site appears isolated from nearby settlements. Some services are within 1km of the site, such as a shop and primary school; however, the character of the area makes it feel quite separate. It is therefore very likely that most residents of the site will choose to travel to meet most of their day-to-day needs by car, contrary to objectives of reducing car use. The site is also adjacent to an internationally protected nature conservation site and appropriate assessment under the Habitats Directive may be required to ensure development here will not harm the protected site.
- 5.3.12 **Chepstow Road, Raglan** – This allocation is proposed to be reinstated for 45 homes. It was included in the Draft Deposit LDP and subject to SA, but removed from the Deposit LDP following a Member decision. The site is in a Rural Secondary Settlement. The findings of the SA therefore remain the same, with some concerns over access to employment at the site, but the potential for development in Raglan to help meet local housing needs and support village services.