

## **Appendix D Sustainability Appraisal of the site at Coed Glas, Abergavenny**

# Monmouthshire Local Development Plan

**Sustainability Appraisal of site at Coed Glas, Abergavenny**

On behalf of **Monmouthshire County Council**



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## Document Control Sheet

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## Contents

- 1 Purpose ..... 1**
  - 1.1 Introduction ..... 1
  - 1.2 Sustainability Appraisal ..... 1
- 2 Site Sustainability Appraisal ..... 2**
  - 2.1 Introduction ..... 2
  - 2.2 Site location ..... 2
  - 2.3 Site Characteristics..... 2

### Tables

- Table 1: Sustainability Appraisal of the site at Coed Glas, Abergavenny ..... 3

# 1 Purpose

## 1.1 Introduction

- 1.1.1 Monmouthshire County Council submitted the Deposit Local Development Plan (LDP) to the Welsh Government in December 2012. During the process of the LDP examination the Inspector found that the LDP housing target must be increased to meet the housing needs in the County.
- 1.1.2 As a result if this requirement housing land allocations were identified, additional or extensions to those already contained in the submitted Deposit LDP. At this stage the site at Coed Glas was identified as contributing the housing target, but the site was not specifically allocated or consulted on, as it was within the urban area. However, subsequently the LDP Planning Inspector has clarified that the Coed Glas site must be consulted on and fully allocated.
- 1.1.3 This report sets out the sustainability appraisal (SA) of the Coed Glas site, it has been prepared by Peter Brett Associates LLP (PBA) on behalf of Monmouthshire County Council.

## 1.2 Sustainability Appraisal

- 1.2.1 All sites that are allocated in the LDP must undergo an SA, using an appraisal matrix, to allow comparative review of sites and identify what the sustainability issues may be in developing the site. For this reason it is necessary for Coed Glas to have an SA prepared.
- 1.2.2 The sustainability implications of the overall increase in the housing target have already been assessed in the *Sustainability Appraisal Report Addendum Monmouthshire LDP: Amended and Additional Sites Consultation Report* (PBA, July 2013). The report identifies the contribution from the Coed Glas site at paragraph 3.1.3. However, as the site was not allocated the SA it did not contain additional detail on site sustainability, as was the case for the new or extended allocations. However, this additional report makes up for that omission.

## 2 Site Sustainability Appraisal

### 2.1 Introduction

2.1.1 Table 1 shows the site SA for the allocation at Coed Glas. This provides a review of the sustainability implications of the site, which can directly be compared to the SA for other allocated sites in the Sustainability Appraisal Report (September 2012) and the developer SAs of alternative sites.

### 2.2 Site location

2.2.1 As is identified at previous stages of the SA of the LDP, development in Abergavenny represents a more sustainable spatial distribution for housing than locating it in the Severnside settlements. This is because Abergavenny is a town with a mix of shops and services that has grown quite gradually over many years. Therefore, housing in these locations is supported by local services that can be easily accessed and help retain the vitality of the town. However, many of the Severnside settlements have grown rapidly due to proximity to the M4. Their housing growth has not necessarily been matched to a growth in community facilities, shops and services. Therefore, there is potential for undesirable sustainability impacts, such as high car use and reliance.

### 2.3 Site Characteristics

- 2.3.1 Overall, the Coed Glas site presents a good opportunity for residential development. It is within an urban area in a largely residential neighbourhood. There is also good access to services and most services are accessible easily on foot or by bus/train. Therefore, development in this location has the potential to support a reduction in car use, as well as equitable access. This is shown by the scores against sustainability objectives relating to accessibility (Table 1), although there may also be a benefit related to climate change. The sustainability objectives in full are shown in Appendix A.
- 2.3.2 Redevelopment for housing will result in the loss of the site's existing use for employment. The jobs provided at the site will have predominantly have been relocated elsewhere in the County, so the overall loss may be limited. However, the employment use will be lost from Abergavenny, which may have an impact on the local economy. The potential for impacts would need to be addressed through an economic impact study with the Council satisfied that this land should not be protected for employment use. The site scores poorly against economic sustainability objectives (Table 1).
- 2.3.3 Currently, the site is publically owned. To achieve the greatest sustainability benefits ensuring that the reuse of the site achieves some social good for the community would be useful. This benefit could be through the provision of housing to meet affordable housing to help address local need, or providing assisted living accommodation. The uncertainty of the impacts is identified in the impacts against community related sustainability objectives in Table 1.
- 2.3.4 The site itself has some constraints and it is vital that new development protects mature trees on site wherever possible. This will have benefits for the townscape setting of the site, in proximity to the Conservation Areas, as well as supporting biodiversity on the site.

Table 1: Sustainability Appraisal of the site at Coed Glas, Abergavenny

<b>Policy SAH9 – Coed Glas, Abergavenny</b>																	
This policy allocates the site of former local authority offices in Abergavenny for 60 residential units.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	●	?	?	?	?	?	-	?	-	-	-	-	?	?	X	?	●/?
<b>Sustainability commentary</b>																	
<p>This site is on the eastern edge of Abergavenny bordering on the A465 dual carriageway and within Abergavenny defined urban area. The site is characterised by mature trees and shrubs on all its boundaries as well as mature trees throughout the site, several on the boundaries are covered by Tree Preservation Orders. Current uses on the site are office buildings, used by the local authority. Buildings only cover a small proportion of the site and the risk is maintained gardens and stands of trees.</p> <p>There is the potential that the redevelopment of this former employment site for housing could have an impact on the economy and employment in Abergavenny. The former local authority uses of the site have been relocated elsewhere in the County. Therefore, although the overall quantity of jobs provided may be largely retained on a countywide basis there will be a loss of employment floorspace for Abergavenny with possible impacts on the local economy and job availability.</p> <p>The site is owned by the Council. To make the best use of publically owned land the site may be most suitable for redevelopment for an alternative public or community use or for housing to meet specific local need, such as affordable or assisted living accommodation. At the very least redevelopment of the site must meet policy requirements for affordable homes.</p> <p>The site has good accessibility, much of the town centre is within 1km of the site. This allows access to doctors surgery's, a dentist, optician, places of worship, numerous public houses, numerous takeaway's, café's, public hall's, hairdresser's, two pharmacies, a post office and a petrol station. A number of smaller shops are also accessible within 1km. The site has moderate access to primary schools, although there are none in 1500m. King Henry VIII Comprehensive School is less than 2km from the site. There are also two bus stops are located within 400m of the site. Frequent services are available to the town centre, with some buses also providing access to other towns such as Brecon and Crickhowell, as well as a longer distance route to Cardiff. In addition, Abergavenny Railway Station is also located within 400m of the site.</p> <p>Besides the mature trees which may provide a habitat for wildlife the site contains no known ecological constraint.</p> <p>The site is very close to two Conservation Areas, although not within either (7m from the Pen-Y-Fal and 115m from the Abergavenny). However, some consideration may need to be given on the appearance of the site from these areas.</p>																	

**Main impacts / mitigation / recommendations**

- As set out in policy consideration must be given to the protection of trees on the site, including the Tree Preservation Orders.
- There may be some impact of the economy of Abergavenny if employment land is lost to other uses. However, if it is demonstrated that this land is surplus to the needs of the town then this impact may not be significant. It may have been useful to consider retaining an element of employment provision on the site.
- This site in the urban area of Abergavenny offers a good opportunity to provide new housing in an accessible location. Proximity to bus stops and the relatively proximity of the town centre should help ensure equitable access for all and encourage non-car travel.
- As the site is publically owned the greatest public good should be sought from its redevelopment. Ideally new development should help local communities, for instance through the provision of affordable housing or housing to meet specific local need.



## **Appendix A LDP Sustainability Objectives**

Headline	Objective	Supporting objectives
Accessibility*	Allow equitable access for all to jobs, services and facilities they need, in a way that reduces reliance on car use	<ul style="list-style-type: none"> <li>• support the growth of mixed use area at transport hubs that have good accessibility by a variety of modes of transport</li> <li>• prioritise walking and cycling, then public transport and finally car users in town centres</li> <li>• <i>reduce reliance on car use to help reduce greenhouse gas emissions</i></li> <li>• reduce disparities in access to services through a combined approach of suitable facility and service provision and public transport links</li> <li>• support the access of rural communities to jobs and services, ideally within villages but also through good public transport networks</li> </ul>
Housing	Provide a range of types and tenures of housing that allows people to meet their housing needs	<ul style="list-style-type: none"> <li>• provide more affordable housing to meet the needs in rural and urban locations, to enable young people and families to remain in their own communities</li> <li>• provide a range of homes to meet the diverse needs residents, including family homes and smaller flats and retirement units</li> <li>• build good quality housing throughout Monmouthshire</li> </ul>
Health, safety and security*	To improve health and wellbeing by encouraging more healthy lifestyles, and protecting people from risk that may impact on their health and/or safety	<ul style="list-style-type: none"> <li>• protect people from the negative health impacts of polluted air and water</li> <li>• ensure equitable access to health services</li> <li>• ensure that new development is designed in such a way as to reduce crime and fear of crime</li> <li>• protect people from the risks of unstable or contaminated land</li> <li>• ensure new development is not in areas at known risk of flood</li> <li>• enhance opportunities for healthy living and help support more healthy lifestyles through access to open space and prioritised cycling and walking routes</li> <li>• <i>protect people for the negative impacts of climate change, such as increased summer temperatures, adverse weather and flooding, through the design and location of new development.</i></li> <li>• <i>ensure that appropriate flood risk protection measures are in place to protect residents well-being</i></li> </ul>
Community	To support and promote the distinctive character of local communities and community cohesion	<ul style="list-style-type: none"> <li>• ensure services and facilities that serve to support local communities are maintained and enhanced as part of new and existing development</li> <li>• allow the communities to be involved in the planning decisions that effect them</li> <li>• help support rural communities, including by helping people remain living in their local area</li> <li>• support a demographic range in all communities, including children, young people, working age and retired people</li> <li>• help in creating development of the type and design that can help avoid adverse impact on the community, such as development that deters anti-social behaviour</li> </ul>
Biodiversity*	Protect, value, manage and enhance healthy functioning ecosystems, habitats and natural species diversity, valuing nature conservation interests wherever they are found.	<ul style="list-style-type: none"> <li>• provide a strong level of protection to sites designated for the national or international importance for nature conservation</li> <li>• allow people to have better access to suitable areas of nature conservation importance to help everyone better understand and value their natural environment</li> <li>• secure opportunities to achieve a net gain in biodiversity through development</li> <li>• development should lead to no net loss in biodiversity</li> <li>• statutory and non-statutory designated nature conservation sites should be afforded a level of protection</li> </ul>

		<p>appropriate to their status</p> <ul style="list-style-type: none"> <li>• ensure new development does not cause the further fragmentation of habitats and protect and enhance network routes for flora and fauna movement</li> <li>• support landscaping that makes use of native species</li> <li>• <i>protect habitats that provide migration routes for species in response to a changing climate</i></li> <li>• designated nature conservation sites should be afforded a level of protection appropriate to their status, from European/intentionally designated sites such as SPA and SAC, to areas of local importance such as LNRs and SINC.</li> </ul>
Landscape*	To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements	<ul style="list-style-type: none"> <li>• help protect and enhance the rural and coastal landscapes, including the Wye Valley AONB, the Lower Wye and Gwent Levels Historic Landscape, as a living and working asset, for their visual quality, and as a recreation resource</li> <li>• protect the setting of towns and villages in the landscape and enhance the transition of urban to rural</li> <li>• help in the positive management of landscapes to protect and enhance their character</li> <li>• <i>ensure that new landscaping planting can adapt to a changing climate, including increased summer temperatures and storm events and fewer frosts.</i></li> <li>• Protect landscape features that provide character to streets and public spaces</li> </ul>
Built environment*	To maintain and enhance the built environment for both its visual character and distinctiveness and to create a better living environment	<ul style="list-style-type: none"> <li>• ensure new development is designed so as to create places that support people making good quality places for living, working and leisure</li> <li>• <i>develop towns that promote walking and cycling and are not focused on car use</i></li> <li>• ensure that the design of new building adds to the character of the area through high quality design and layout</li> <li>• promote and protect design led development and buildings of local as well as national architectural importance</li> <li>• <i>ensure the layout and design of new development helps reduce energy demand and therefore greenhouse gas emissions</i></li> <li>• <i>ensure new development is designed to be able to adapt to the impacts of climate change, including increased summer heating, storm events and flooding</i></li> </ul>
Historic heritage*	Understand, value, protect and restore, where necessary, the historic cultural heritage of the area, including features of the built and semi-natural environment	<ul style="list-style-type: none"> <li>• ensure new development takes account of and protects and enhances where necessary the cultural and historic heritage</li> <li>• where possible identify historic features at risk and help restore these bringing them back into good use</li> <li>• ensure buried archaeological assets are protected from harmful impacts of development, or other appropriate management where suitable</li> <li>• ensure that the features of historic landscape are respected in new development</li> <li>• ensure that locally important heritage is suitably considered in planning for new development</li> <li>• <i>where planning permission is required ensure the restoration and repair of historic built heritage is carried out to withstand the impacts of climate change, including adverse weather events</i></li> </ul>

Air*	To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere to protect from climate change	<ul style="list-style-type: none"> <li>• help reduce reliance on car travel by making sure there are real viable alternatives available for all people</li> <li>• ensure new development in town centre locations does not lead to worsening air quality, in particular aiming to improve air quality in Chepstow and Usk town centres</li> <li>• help to reduce energy use and thereby help to reduce emissions from coal, oil and gas power generation</li> <li>• control the locations of polluting development to ensure it is not located near residential areas</li> <li>• help reduce waste to landfill, and set standards for management, to avoid methane emissions</li> <li>• <i>help reduce greenhouse gas emissions through reducing car travel, waste management and reduce energy demand from non-renewable resources</i></li> </ul>
Water quality	To maintain and improve the quality of ground, surface and coastal waters	<ul style="list-style-type: none"> <li>• ensure new development has sufficient sewerage and waste water treatment to avoid harm to water quality</li> <li>• ensure contaminated land is suitably remediated to avoid water quality impacts</li> <li>• implemented suitable SUDS to avoid run-off of potential polluted water to water courses or aquifers</li> <li>• reduce diffuse pollution</li> <li>• help to meet objectives of achieving good ecological status for surface waters; good status for groundwaters; and no deterioration across all water bodies</li> </ul>
Water supply*	To maintain the quantity of water available including potable water supplies, and ground water and river levels.	<ul style="list-style-type: none"> <li>• <i>ensure new development makes the best use of potable water, incorporating re-use of grey water in new development</i></li> <li>• ensure development takes into account the impacts of climate change and reduce summer water availability in planning outdoor spaces</li> </ul>
Flood risk*	Ensure that new development is designed and located to avoid the risk of flooding, and ensure the risk of flooding is not increased elsewhere	<ul style="list-style-type: none"> <li>• <i>ensure that new development is located so as to avoid the risks of fluvial and tidal flooding associated with climate change</i></li> <li>• <i>aim for greenfield water run-off rates from new development</i></li> <li>• <i>make use of SUDS to avoid run-off to rivers</i></li> <li>• ensure that new development does not give rise to increased risk, either on site or through development that exacerbates flooding elsewhere</li> </ul>
Minerals and waste*	To ensure that primary materials and minerals are managed in a sustainable way, by safeguarding mineral areas, encouraging re-use and recycling and avoiding final disposal of resources	<ul style="list-style-type: none"> <li>• <i>reduce waste, particularly to landfill</i></li> <li>• safeguard mineral resources</li> <li>• encourage better building practices that reduce construction waste and ensure demolition waste is reused in development</li> <li>• help to reduce the use of primary resources by providing appropriate sites for more sustainable waste management, including re-processing, recycling and storage</li> <li>• <i>help reduce greenhouse gas emissions through reducing waste to landfill and suitable management of landfill gases</i></li> </ul>
Land / soil	To use land efficiently by prioritising development on previously developed land where possible, and using existing land efficiently by tackling contamination and	<ul style="list-style-type: none"> <li>• protect greenfield land from development where development would be more suitably located on brownfield land</li> <li>• use suitable density standards that ensure the best use of developable land in appropriate locations</li> <li>• avoid building on higher quality agricultural soils, which are scarce in Monmouthshire</li> <li>• ensure contaminated land is subject to appropriate remediation to bring it back into suitable use</li> </ul>

	protecting higher grade agricultural soil.	
Energy*	To secure energy efficiency improvements in all new buildings and encourage energy generation from renewable sources.	<ul style="list-style-type: none"> <li>• <i>promote energy generation from renewable resources, including micro-generation as part of the energy requirements of new development</i></li> <li>• <i>ensure that energy is used more efficiently, including in the design of new development, through promoting local energy generation and reducing car travel</i></li> <li>• <i>help to implement energy schemes that will help meet Wales targets for renewable energy generation, where suitable</i></li> <li>• <i>promote community or district heat and power schemes</i></li> </ul>
Employment	Provide a range of jobs within Monmouthshire that help meet the needs of the resident workforce	<ul style="list-style-type: none"> <li>• maintain a motivated, highly skilled and educated workforce</li> <li>• provide a better match between the skills of the workforce and the type of jobs available</li> <li>• promote local employment to reduce people's need to travel to find work</li> </ul>
Wealth creation	Raise prosperity and quality of life by developing a more self-sustaining local economy encouraging indigenous growth	<ul style="list-style-type: none"> <li>• support the diversification of the rural economy and continued support to farming, encouraging food production for the local market</li> <li>• support dispersed employment areas to provide local jobs</li> <li>• provide an infrastructure of transport, communications and land that helps attract new business, including the start-up and growth of indigenous businesses</li> <li>• maintain a coherent and successful range of businesses and build up local supply and distribution chains</li> <li>• help in increasing the income to the area through tourism</li> </ul>
Climate change – cross-cutting	Ensure development responds to the impacts and causes of climate change by integrating mitigation and adaptation approaches in new development	<ul style="list-style-type: none"> <li>• all supporting objectives in <i>italics</i> relate to climate change sustainability criteria</li> </ul>

In the table the \* symbol indicates a climate change related objective  
*Italics: climate change related supporting objective and indicator*