



## Planning Statement

# Land at Chepstow Road, Raglan

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## 1.0 Introduction

- 1.1 Alder King Planning Consultants have been instructed by Monmouthshire County Council to prepare a planning statement to support an Outline planning application for residential development at a site located at Chepstow Road, Raglan.
- 1.2 This application has been made following pre-application consultation with Monmouthshire Council and members of the public.
- 1.3 This planning statement should be read in conjunction with the following plans and reports submitted as part of the planning application:-
  - Architectural Drawings / Illustrative layout plan;
  - Green Infrastructure Plan;
  - Design and Access Statement;
  - Transport Statement;
  - Flood Consequences Assessment & Outline Drainage Strategy;
  - Ecological Appraisals;
  - Arboricultural Assessment;
  - Landscape and Visual Impact Assessment;
  - Public Consultation Report;
  - Historic Environment Desk Based Assessment & Archaeological Earthwork Survey.

## 2.0 Site and Surroundings

- 2.1 The application site extends to approximately 2.18 hectares (5.4 acres) and currently comprises a greenfield site. The northern boundary of the site is formed by some mature trees, the southern by the Nant y Wilcae, the western by back gardens of the adjoining properties along Fayre Oaks and The Willows, and the eastern by hedges, a property known as Brooklands Lodge and Chepstow Road.
- 2.2 The surrounding context of the site is predominantly residential in character, with existing housing to the north and west. Given its edge of village location, further to the south and east is more rural in character, comprising of fields. The site is in close proximity to Ragland Surgery and Raglan VC Primary School, which are located on the opposite side of Chepstow Road. The main high street is a short walk to the north west.
- 2.3 The southern part of the site is located within flood zone C2 and the middle part within flood zone B, however the site is not the subject of any other specific safeguards or designations.

- 2.4 There are no listed buildings on, or immediately adjacent to the site however, the centre of the village is designated as a conservation area and is also home to a number of listed buildings including the Grade II\* listed St Cadoc's Church. Raglan Castle, which is Grade I listed and its grounds an historic park and garden, is also located approximately 1.2km to the north.

### 3.0 Planning History

- 3.1 Following a review of the Council's online planning application database the only planning application relating to the site is as follows:-

- DC/2012/00682 – Access formation to land on Chepstow Road – approved 23/10/2012

### 4.0 Development Proposals

- 4.1 This is an Outline application with all matters reserved apart from Access for the erection of up to 45 no. dwellings. Access is proposed from Chepstow Road.
- 4.2 Further details of the proposals are shown on the accompanying illustrative plans submitted with the application which show how the residential development, surface water drainage, landscaping and other associated infrastructure could be delivered on the site.
- 4.3 The details of layout, appearance, scale and landscaping will be the subject of future reserved matters applications.

### 5.0 Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purposes of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 5.2 The Development Plan for the site currently comprises the Monmouthshire Local Development Plan (MLDP) which was adopted on 27 February 2014. Other material considerations include adopted Supplementary Planning Guidance (SPGs), Technical Advice Notes (TANs) and Planning Policy Wales (PPW).

#### **Monmouthshire Local Development Plan**

- 5.3 The adopted Local Development Plan map shows that the site is located within the settlement boundary.
- 5.4 In terms of the most relevant planning policy, the site benefits from an allocation within the adopted MLDP for 45 no. dwellings under policy SAH10(iii). This policy also states that no highly vulnerable development can take place in those parts of the site that are within the designated C2 flood zone, unless a flood consequences assessment has been carried out that demonstrates that the consequences of flooding in these areas is acceptable.

- 5.5 Although the site is allocated for residential development, other policies relating to the usual development control consideration will also be applicable. A summary of these is provided below.
- 5.6 As confirmed by policy H1, new residential development within development boundaries will be permitted, subject to detailed planning considerations and other policies of the MLDP. In addition, policy S1 relates to spatial distribution of new residential development and confirms that a small amount of new housing development will be directed to Raglan. Following on from this Policy S4 advises that within Raglan, development sites for 5 or more dwellings will make provision (subject to appropriate viability assessment) for 35% of the total number of dwellings on the site to be affordable. This places a requirement for the site to provide 16 no. affordable dwellings.
- 5.7 Policy S7 advises that new or improved infrastructure and facilities to remedy any deficiencies may need to be provided either in the form of on-site or off-site provision or a financial contribution to make development acceptable.
- 5.8 In accordance with policy S12 all new development must demonstrate sustainable and efficient resource use and avoid the siting of inappropriate development in areas at risk of flooding. In addition to this, policy SD3 confirms that highly vulnerable development will not be permitted in areas which may be liable to flooding. Less vulnerable development will be permitted where it can be demonstrated that the criteria under this policy are met. This includes ensuring that the development is or can be protected by approved flood protection measures. Where required, adequate surface water mitigations measures should also be included. Following this policy SD4 advises that development proposals will be expected to incorporate water management measures, including Sustainable Urban Drainage Systems to reduce surface water run-off and minimise its contribution to flood risk elsewhere.
- 5.9 Furthermore development should not impact on the water environment and associated land as stipulated by policy EP2.
- 5.10 Development proposals must maintain the character and quality of the landscape, the green infrastructure network and protect and positively manage and enhance biodiversity and geological interests. They should also seek to integrate landscape elements, green infrastructure, biodiversity features and ecological connectivity features, to create multifunctional, interconnected spaces that offer opportunities for recreation and healthy activities such as walking and cycling in accordance with policy S13.
- 5.11 Policy S16 states that, where appropriate, all development proposals shall promote sustainable, safe forms of transport which reduce the need to travel, increase provision for walking and cycling and improve public transport provision.
- 5.12 Development should also contribute to creating high quality, attractive and sustainable places in accordance with policy S17.
- 5.13 Policy CRF2 advises that development proposals will be assessed against the Council's standards for recreation, open space and allotments. New residential development should provide appropriate amounts

of outdoor recreation and public open space in accordance with these standards. The application proposals fall below the threshold for making provision for allotments.

- 5.14 In relation to sustainable construction and energy efficiency, all new development proposals will be required to incorporate efficient resource use during construction, operation and maintenance, as required by policy SD2.
- 5.15 Policy LC5 seeks to protect and enhance landscape character and states that development proposals that would impact upon landscape character, must demonstrate through a landscape assessment how landscape character has influenced their design, scale, nature and site selection. Development will be permitted provided it would not have an unacceptable adverse effect on the special character or quality of Monmouthshire's landscape in terms of its visual, historic, geological, ecological or cultural aspects. To demonstrate compliance with this, the criteria listed under this policy must be met.
- 5.16 Following this policy G11 advises that development proposals will be expected to maintain, protect and enhance Monmouthshire's diverse green infrastructure by adhering to the criteria listed. This includes ensuring that individual green assets are retained wherever possible and integrated into new development and incorporating new and/or enhanced green infrastructure of an appropriate type, standard and size.
- 5.17 Development must not have a significant adverse effect on sites of biodiversity and/or geological importance unless the need for the development clearly outweighs these and the development cannot reasonably be located elsewhere. Where development is permitted, it will be expected that any unavoidable harm is minimised by effective avoidance measures and mitigation. Where nature conservation interests are likely to be disturbed or harmed by development proposals, applications must be accompanied by an ecological survey and assessment of the likely impact of the proposal on the species/habitats, and, where necessary, shall make appropriate provision for their safeguarding in accordance with the criteria set out under policy NE1.
- 5.18 Development proposals should have regard to amenity and environmental protection considerations as set out under policy EP1 and put forward appropriate measures to mitigate any potential harm.
- 5.19 In relation to highway impacts, application for developments which are likely to have a significant impact on trip generation and travel demand must, as appropriate, be accompanied by a Transport Assessment. Development that is likely to create significant and unacceptable additional traffic growth in relation to the capacity of the existing road network and/or fails to provide a safe and easy access for road users will not be permitted, unless appropriate proposals for related improvements to the highway system or a contribution towards mitigating traffic management/reduction measures are made. Where appropriate the adopted highway design guide and parking guidelines should be satisfied, as required by policy MV1.
- 5.20 In addition, policy MV2 requires development to include provision for and the integration of appropriate sustainable transport links dependent on their location, size and local need. Development should also link into the existing or proposed public rights of way, walking, cycleway and green infrastructure networks.

- 5.21 Policy DES1 relates to general design considerations and states that all development should be of a high quality sustainable design and respect the local character and distinctiveness of Monmouthshire's built, historic and natural environment. Development proposals will be required to comply with the criteria listed under this policy.
- 5.22 Development proposals that provide and/or enhance community and recreation facilities will be permitted within or adjoining town and village development boundaries.

### **National Planning Policy**

#### *Planning Policy Wales*

- 5.23 Planning Policy Wales (PPW) (Ed 9 – November 2016) provides the overarching policy framework for planning in Wales. PPW sets out that the planning system must provide an adequate and continuous supply of land and manage development in the public interest, contributing to improving the economic, social, environmental and cultural well-being of Wales.
- 5.24 Paragraph 4.3.1 lists the sustainability principles underpinning Welsh Government's approach to planning policy for sustainable development.
- 5.25 The following chapters of PPW have been reviewed and considered during the preparation on this planning application:-
- Chapter 5 – Conserving and Improving Natural Heritage
  - Chapter 8 – Transport;
  - Chapter 9 – Housing;
  - Chapter 12 – Infrastructure and Services;
  - Chapter 13 – Minimising and Managing Environmental Risks and Pollution;

#### *Technical Advice Notes (TANs)*

- 5.26 TANs should be taken into account by local planning authorities and should be read alongside the guidance within PPW. A number of TANs are relevant to the consideration of this scheme. Those of particular relevance include:-
- TAN 2: Planning and Affordable Housing (2006). This TAN provides guidance on the role of the planning system in delivering affordable housing.
  - TAN 5: Nature Conservation and Planning (2009). This TAN provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

- TAN 12: Design (2014) – This TAN provides guidance on how good design should be achieved through the planning process.
- TAN 15: Development and Flood Risk (2004). This TAN provides guidance which supplements the policy set out in PPW in relation to development and flooding.
- TAN 18: Transport (2007) – This TAN describes how to integrate land use and transport planning. It explains how transport impacts should be assessed and mitigated.

### **Other Material Considerations**

#### *Supplementary Planning Guidance (SPGs)*

5.27 A number of SPGs have been produced by Monmouthshire Council to provide further detail on certain policies and proposals within the MLDP. The following SPGs have been taken into consideration as part of this planning application:-

- Affordable Housing SPG (March 2016);
- Renewable Energy and Efficiency (March 2016);
- Green Infrastructure (April 2015);
- Monmouthshire Parking Standards (January 2013).

## **6.0 Pre-application Consultation**

6.1 The application proposals were submitted to the Council as a formal pre-application enquiry in November 2017. A meeting with the relevant officers at the Council was held on 12 December 2017 and a written response was received from a planning officer on 12 January 2018. This response also incorporated feedback from some of the key consultees.

6.2 In response to this feedback changes were made to the application proposals, including the provision of an additional pedestrian link from Fayre Oaks. A revised ecological appraisal has been prepared, as well as a Landscape and Visual Impact Assessment and Green Infrastructure Plan to address comments made by the various consultees.

### **Community Consultation**

6.3 Following the pre-application feedback a public consultation event was held on 30 January 2018 at Raglan Old Village Hall. The details of this, as well as amendments that have been made to the scheme following this event, are contained in the accompanying Public Consultation Report.



## 7.0 Planning Justification

### Principle of Development

- 7.1 Given the site benefits from an allocation in the MLDP the principle of residential development on the site is acceptable and determination of the application should be focused on the technical details of the scheme having regard to the various policy requirements. Notwithstanding the allocation within the MLDP, this is a sustainable location.

### Layout and Design

- 7.2 As all matters are reserved apart from access, the precise detail of the development has not yet been worked up. The illustrative masterplan does however show how the different areas of the site could be developed in response to the constraints and opportunities presented by the site.
- 7.3 It is anticipated that a range of house types will be provided in a mix of terraced, semi-detached and detached dwellings on well-proportioned plots with generous gardens. It is anticipated that development will feature typically two storey dwellings but with some single storey and 2.5 storey homes in order to add variety and interest. The development will be designed to reflect and complement the wider context of the village in terms of its overall architectural style and will look to positively address the street frontage.
- 7.4 Access is taken from Chepstow Road and an indicative internal road layout is shown within the design and access statement.
- 7.5 Potential areas of landscaping and open space are also indicatively shown as well as potential pedestrian links to connect the development with the village and existing footpaths.

### Flooding / Drainage

- 7.6 As required by the allocation, no development is proposed within flood zone C2 and it is envisaged that this could be provided as an amenity, open space area for both residents of the development. The remainder of the site is located in flood zone B and A and the supporting flood risk assessment confirms that residential development is appropriate in these areas. All sources of flood risk for the area proposed for built development have been identified to be low and flood risk mitigation measures are not required, although minimum finished floor levels have been recommended.
- 7.7 The surface water drainage strategy has been developed to respect the illustrative layout. Infiltration testing has been undertaken at the site which concluded that this is not a feasible option for managing surface water. As such an on-site attenuation feature is proposed which is shown on the illustrative masterplan.

### Heritage / Archaeology

- 7.8 The proposed development would have no or a very weak, visual relationship with Raglan Castle and its grounds and the relationship between the site and the conservations area and church is limited.

Consequently it is not considered that the proposed development would significantly impact on these designated historic assets.

- 7.9 The application is supported by an Historic Environment Desk Based Assessment which concluded that there was low potential for the survival of Prehistoric and Roman period archaeological remains on the site but high potential for the survival of medieval agricultural archaeological evidence in the form of ridge and furrow earthworks in the northern part of the site, and the remains of a water mill, potentially from the early post medieval period or earlier, in the southern part. It was recommended that a detailed topographic survey of the site be carried out to obtain more detail of these features and this was subsequently undertaken. As the potential mill remains are located on part of the site where no development is proposed, it was concluded that no further investigation of this feature was required. The detailed topographic survey confirmed the presence of upstanding ridge and furrow earthworks and details of this are shown in the submitted Archaeological Earthworks Survey report. It is considered that the report sufficiently preserves by record this archaeological feature and therefore no further intrusive investigation is required.

### **Ecology**

- 7.10 A number of ecological appraisals have been undertaken in relation to the site and these are submitted as part of the application. The results of these appraisals concluded that the site is of moderate interest to wildlife, the main grassland areas less so than the boundary hedges. The riparian corridor to the south offers some potential for wild animals, including otters and white clawed crayfish and must not be disturbed as a consequence of any development. This part of the site is left undeveloped within the illustrative masterplan, therefore complying with this recommendation.
- 7.11 Whilst the hedges and riparian corridor provide foraging and commuting corridors for a number of species, including bats, there is no potential for the site to be use by bats for roosting. No evidence to suggest the presence of badgers was found, although the site may be used for foraging purposes.
- 7.12 Subject to the imposition of the recommendations within the ecological appraisal, it is considered that the development can be accommodated on the site without having a detrimental impact on ecology.

### **Landscape Impact / Landscaping**

- 7.13 A Landscape and Visual Impact Assessment is submitted alongside the application which concludes that in terms of landscape effects given the well-contained nature of the site, any effects associated with development on it would be localised and would not extend to the wider countryside or the village's historic core. In terms of visual effects, there are a small number of significant adverse effects, namely those views experienced by residents, walkers and motorists within the immediate vicinity of the site for whom close views over the site would change from an open field to built form. However, it is not considered that these significant effects would extend beyond the locations in close proximity to the site. From distant views the site is difficult to discern and the development would either be undiscernible or effects would be negligible, including in relation to the heritage assets within the wider vicinity.

7.14 Overall it is considered that the application site can successfully accommodate the development proposed without giving rise to any significant effects on the landscape character of the wider area or the visual amenity of those using it.

7.15 The application is also supported by a Green Infrastructure plan.

#### **Trees / Hedgerows**

7.16 With the exception of some minor sections of hedgerow on the boundary of the site where vehicular and pedestrian links into/out of the site are located, it is proposed to retain the existing boundary hedgerows and trees.

#### **Transport / Highways**

7.17 The application is supported by a Transport Statement which has assessed the potential highway impacts that could arise as a result of the development. This demonstrates that there are no existing safety issues identified in the area and that the site is attractive for non-car borne trips to local facilities. In addition, the site will generate low traffic volumes that will have insignificant impact at the access or at junctions in Raglan.

7.18 Parking provision will be finalised at reserved matters stage, however the design and access statement advises that it should be possible to accommodate the parking requirements of the development within the site in the form of 'on-plot', private garages and shared parking areas.

#### **Affordable Housing**

7.19 The development proposals include the provision of 35% (16 units) affordable housing which is in accordance with policy S4.

## **8.0 S106 Draft Heads of Terms**

8.1 At this stage it is anticipated that S106 contributions will be required in relation to the following. This will however be subject to negotiation during the determination period.

- Off-site Highway improvements;
- Affordable housing;
- Open space and recreation.

## **9.0 Conclusion**

9.1 The content and form of the application has been brought forward in response to the planning policy and physical context of the site, technical and environmental constraints.

- 9.2 As demonstrated by the supporting reports there are no technical objections and the application can positively address the various considerations e.g. access, ecology, flooding and drainage, highways, heritage and landscape impact and can create a safe, sustainable and acceptable residential environment.
- 9.3 It is therefore considered that the application should receive positive support and that planning permission should be granted.